

March 31, 2022

VIA ELECTRONIC FILING

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

**Re: *Public Service Company of Colorado*
Xcel Energy Operating Companies Joint Open Access Transmission Tariff
Docket No. ER22-____-000
Revised Depreciation Rates in Table 25 to Attachment O-PSCo**

Dear Secretary Bose:

Pursuant to section 205 of the Federal Power Act, 16 U.S.C. § 824d, part 35 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations, 18 C.F.R. pt. 35 (2021), and Order No. 714,¹ Public Service Company of Colorado ("PSCo") submits revisions to the PSCo Transmission Formula Rate Template ("Template" generally or "Revised Template" with revisions) included in Attachment O-PSCo of the Xcel Energy Operating Companies Joint Open Access Transmission Tariff ("Tariff" or "Xcel Energy Tariff").² The Template revisions are necessary to update the depreciation rates stated in Table 25 of the Template so that they remain consistent with those recently approved by the Colorado Public Utilities Commission ("CoPUC" or "Colorado Commission") in a Colorado retail rate case.

PSCo respectfully requests waiver of the Commission's prior notice requirements³ and certain sections of the Xcel Energy Tariff, as described herein, to allow the enclosed Template revisions to be made effective April 1, 2022, which is one (1) day after filing, without suspension or hearing, to align the effective date with the date the CoPUC made the new depreciation rates effective for retail ratemaking purposes. As discussed further below, PSCo proposes to defer collecting the revised depreciation rates deferred until the true-up for the 2022 rate year.

Contemporaneously with this filing, PSCo is also submitting a filing under Section 205 to revise the depreciation rates used in the Production Formula Rate Template included in Attachment A of the PSCo Assured Power and Energy Requirements Service Tariff ("Assured Power Tariff") to reflect the revised depreciation rates approved by the CoPUC. Those tariff revisions are proposed to be effective the same date as the Tariff changes in the instant filing.

¹ *Electronic Tariff Filings*, Order No. 714, FERC Stats. & Regs. ¶ 31,276 (2008).

² Xcel Energy Operating Companies, FERC Electric Tariff, Second Revised Volume No. 1.

³ 18 C.F.R. § 35.3(a)(1).

I. BACKGROUND

A. Background on PSCo and the Attachment O-PSCo Formula Rate Template

PSCo is a wholly-owned utility operating company subsidiary of Xcel Energy Inc. (“Xcel Energy”), a public utility holding company. PSCo is an integrated electric utility that, *inter alia*, generates, transmits, distributes, and sells electric energy at cost-based regulated rates to approximately 1.5 million retail customers in the State of Colorado subject to the regulatory authority of the CoPUC. PSCo also provides cost-based retail natural gas service to approximately 1.4 million retail customers in Colorado, and steam service to approximately 120 customers in Denver, Colorado, subject to the jurisdiction of the CoPUC.

PSCo provides open access wholesale transmission services to transmission customers under Parts II or III and ancillary-only services to ancillary service customers under Part IV of the Tariff, respectively. Approximately 85 percent of the transmission loads on the PSCo system are PSCo retail native loads; the remaining 15 percent are wholesale loads. PSCo operates a Balancing Authority Area (“BAA”) in the Western Interconnection region. PSCo also provides wholesale requirements sales service at cost-based rates to five municipal and cooperative customers under the Assured Power Tariff.⁴

Xcel Energy Services Inc. (“XES”) is the centralized service company subsidiary of Xcel Energy. As such, XES makes filings with, and appears in proceedings before, the Commission on behalf of PSCo and the other Xcel Energy Operating Companies.⁵

The PSCo transmission formula rate template was initially a historic test year template established by a settlement approved by the Commission in Docket No. ER04-1174-000 *et al.*⁶ Most of the currently effective transmission-related depreciation rates were approved by the CoPUC in 2007 and incorporated in the PSCo transmission formula rate template in Docket No. ER08-224-000, effective January 1, 2007.⁷ The depreciation rates accepted in Docket No. ER08-224-000 were then incorporated into Table 25 of the currently effective Attachment O-PSCo Template when PSCo changed to a forward looking rate template with an annual true-up in Docket

⁴ The five customers are the City of Burlington, Colorado; Grand Valley Rural Power Lines, Inc. (“Grand Valley”); Holy Cross Electric Association, Inc. (“Holy Cross”); Intermountain Rural Electric Association (“Intermountain”); and Yampa Valley Electric Association, Inc. (“Yampa Valley”).

⁵ The other Xcel Energy Operating Companies are Northern States Power Company, a Minnesota corporation (“NSPM”), Northern States Power Company, a Wisconsin corporation (“NSPW”), and Southwestern Public Service Company (“SPS”). The rates of the other Xcel Energy Operating Companies are not affected by this filing.

⁶ *Xcel Energy Services Inc.*, 115 FERC ¶ 61,011 (2006) (approving uncontested settlement resolving the Tariff transmission and ancillary services rates for both PSCo and its affiliate Southwestern Public Service Company).

⁷ *Public Service Company of Colorado*, Docket No. ER08-224-000 (January 4, 2008) (delegated letter order).

No. ER12-1589-000 *et al.*, which was resolved by settlement approved by the Commission.⁸ The settlement tariff sheets in Docket No. ER12-1589-000 also added certain regulatory asset amortizations, and a list of PSCo production and distribution depreciation rates, to Table 25.

Pursuant to the Formula Rate Implementation Procedures (“Protocols”), which are included as Appendix 1 to the Template, PSCo’s develops a forecast Annual Transmission Revenue Requirement (“ATRR”) each year. The projected ATRR is then subject to an annual true-up based on actual costs and loads when actual data becomes available. PSCo calculates the true-up by June of the year following the estimated Rate Year, and the true-up is applied to customer bills by the end of the year following the estimated Rate Year. The Protocols provide for postings on PSCo’s Open Access Same-Time Information System, customer meetings, discovery and challenge processes, and an Annual Informational Update filing with the Commission with the Estimated Rates for the upcoming Rate Year.⁹

XES filed to restate the Xcel Energy Tariff in the Commission’s eTariff system, including Attachment O-PSCo, in Docket No. ER16-1422-000 as a result of changing to new eTariff software in April 2016. The Tariff restatement did not change the depreciation and amortization rates in Table 25 or the Attachment O-PSCo Template. The Commission accepted the restated Xcel Energy Tariff effective April 16, 2016.¹⁰ Since this baseline filing in 2016, the Commission has accepted revisions to Table 25 of the Template to update depreciation rates so they remain consistent with depreciation rates approved by the CoPUC in Docket Nos. ER16-1731-000, ER19-2077-000 and ER20-251-000.¹¹

⁸ See *Public Service Company of Colorado*, 145 FERC ¶ 61,266 (2013) (accepting partial settlement of all issues other than return on equity (“ROE”) and requiring a compliance filing). See also *Public Service Company of Colorado*, 149 FERC ¶ 61,077 (2014) (accepting settlement of ROE issue). PSCo has filed certain revisions to the Attachment O-PSCo Template since Docket No. ER12-1589, but those tariff revisions did not modify the depreciation rates in Table 25. See *Public Service Company of Colorado*, 155 FERC ¶ 61,028 (2016); and *Public Service Company of Colorado*, Docket No. ER16-1686-000 and ER16-236-002 (Aug. 9, 2016) (delegated letter order) (accepting tariff revisions to establish pro-ration of accumulated deferred income taxes).

⁹ The informational filing is due on January 15 each year, unless January 15 falls on a weekend or holiday, and then it is filed the next business day. The informational filing for the 2022 Rate Year was submitted on January 18, 2022. *Public Service Company of Colorado*, Informational Filing of 2022 Annual Transmission Formula Rate Update, Docket No. ER12-1589-000 (Jan. 18, 2022).

¹⁰ See *Public Service Company of Colorado*, Docket No. ER16-1422-000 (Aug. 16, 2016) (delegated letter order).

¹¹ See *Public Service Company of Colorado*, Docket No. ER16-1730-000 (June 30, 2016) (delegated letter order) (granting waiver of Commission’s notice requirements pursuant to 18 C.F.R. § 35.11 to allow depreciation rates to go into effect at the same time as the depreciation rates established in a CoPUC proceeding); *Public Service Company of Colorado*, Docket No. ER19-2077-000 (Sept. 11, 2019) (delegated letter order) (same); *Public Service Company of Colorado*, Docket No. ER20-251-000 (Jan. 23, 2020) (delegated letter order) (same). The Commission subsequently accepted a new effective date for revised depreciation rates in Docket No. ER20-1371-000. *Public Service Company of Colorado*, Docket No. ER20-1371-000 (May 4, 2020) (delegated letter order).

B. Background on PSCo's Generation Ancillary Services Rates

With the exception of Schedule 16, PSCo's currently effective generation-based ancillary services rates –Schedule 2 (Reactive Supply and Voltage Control from Generation Sources Service), Schedules 3 and 3A (Regulation and Frequency Response Service), Schedule 5 (Operating Reserve – Spinning Reserve Service) and Schedule 6 (Operating Reserve – Supplemental Reserve Service) – were placed into effect through the settlement in Docket No. ER12-1589-000. These generation based ancillary service rates are calculated using formulas set forth in Attachment O-PSCo (Tables 28 to 31) but use historic actual data based on the most current PSCo FERC Form 1 data (rather than forecast data) and are not subject to true-up. As such, the currently effective Schedule 2, 3, 3A, 5 and 6 rates in effect for 2022 use 2020 actual costs and loads. Ancillary service rates are generally calculated by multiplying the installed cost of the portion of the generation units supplying the ancillary service by a Fixed Charge Rate (“FCR”) calculated in Table 32 of the Template (WP_FCR- Fixed Charge Rate Wksht, line 21).

Schedule 16 (Flex Reserve Service), another generation based ancillary service, was placed into effect through a settlement agreement approved by the Commission in Docket No. ER14-1969.¹² Schedule 16 rates are also calculated using a formula set forth in Attachment O-PSCo (Table 35) and use historic actual data based on the most current PSCo FERC Form 1 data, and the FCR calculated on Table 32, and are not subject to true-up.¹³

The Tariff restatement in Docket No. ER16-1422-000 did not change the PSCo Schedule 2, 3, 3A, 5, 6 or 16 ancillary services rate calculations set forth in Attachment O-PSCo.¹⁴ ER20-251-000 is the most recent depreciation-related filing impacting ancillary service rates where the Commission accepted the Common Utility Plant depreciation rates in the Template to be consistent with those approved by the CoPUC.

C. Background of Recent Retail Proceedings Impacting Depreciation

On July 2, 2021, PSCo filed a retail electric rate case with the CoPUC (Proceeding No. 21AL-0317E). The electric rate case proposed a “2022 future test year” that would allow PSCo to implement increases in retail electric rates in 2022. Among other things, the rate case proposed to establish revised electric depreciation rates based on an Electric and Common Utility Plant Depreciation Rate Study (“Depreciation Rate Study”) prepared for PSCo by Alliance Consulting Group (“Alliance”). A copy of the Depreciation Rate Study is provided as Exhibit XES-201. The Depreciation Rate Study evaluated Electric and Common Utility Plant depreciable assets using actual plant asset balances as of December 31, 2020, to determine appropriate depreciation rates for the projected time period commencing January 1, 2022.

¹² *Public Service Company of Colorado*, 154 FERC ¶ 61,164 (2016).

¹³ An update to Schedule 16 in Docket No. ER21-291-000 is currently subject to pending settlement judge procedures.

¹⁴ PSCo subsequently filed administrative corrections to the Schedule 16 (Flex Reserve Service) formula, which were accepted in Docket No. ER18-2428. See *Public Service Company of Colorado*, Docket No. ER18-2428 (2018) (delegated letter order); *order granting clarification* 166 FERC ¶ 61,201 (2019).

On January 5, 2022 PSCo filed a Unanimous Comprehensive Settlement Agreement (“Settlement Agreement”), which provided a full and complete resolution of all issues raised in CoPUC Proceeding No. 21AL-0317E except for one issue that was reserved for litigation. Specifically, the CoPUC’s evaluation of the appropriate approaches to recovering the remaining net book value and future decommissioning costs associated with Craig Generating Station Unit 2 (“Craig”) and Hayden Generation Station Units 1 and 2 (“Hayden”) was reserved for litigation and CoPUC determination. A copy of the Settlement Agreement is provided as Exhibit No. XES-202. Among other things, the Settlement Agreement accepted the results of the Depreciation Rate Study prepared for PSCo by Alliance Consulting Group.

Until the CoPUC acted, there was a possibility that the CoPUC would direct changes to the Settlement Agreement’s depreciation rates or require further proceedings. However, the CoPUC approved the Settlement Agreement in a Decision formally issued on March 24, 2022.¹⁵ The CoPUC Decision made no changes to depreciation rates supported by the Depreciation Rate Study and proposed in this instant filing but declined to make rulings regarding depreciation for Craig and Hayden, and determined instead that issue could be resolved in a separate, subsequent case. A copy of the CoPUC Decision is provided as Exhibit No. XES – 203.

II. DESCRIPTION AND JUSTIFICATION OF TARIFF REVISIONS

A. Reason for Filing

As explained in the enclosed testimony of Ms. Laurie J. Wold (Exhibit No. XES - 200), depreciation is an estimation of future expectations.¹⁶ Using those estimations, the cost of the asset is spread ratably to customers over that period.¹⁷ If the estimation of the useful period changes as the asset is used, the depreciation estimate should be realigned to those new estimates so that the asset’s cost is fully recovered by the time it is retired.¹⁸ When depreciation rates are set at a level that does not reflect the actual life and retirement characteristics of a utility’s assets, the cost of the asset will not be recovered ratably from all customers that use the asset.¹⁹ The Commission recognizes these fundamental principles of depreciation, as its policy encourages public utilities to seek to adjust their depreciation rates as more updated information becomes available, in order to assure as near as possible full recovery of the costs of electric plants.²⁰ The purpose of this filing is to bring PSCo’s depreciation rates used in the Template in-line with the depreciation rates used

¹⁵ See Decision No. C22-0178, *Decision Approving Settlement Agreement, Permanently Suspending Tariffs, Establishing Rates, Requiring Compliance Filings, and Ordering the Filing of a Phase II Rate Case*, CoPUC Proceeding No. 21AL-0317E (Mailed March 24, 2022) (“CoPUC Decision”).

¹⁶ Direct Testimony of Laurie J. Wold, Exhibit No. XES - 200 (“Wold Direct Testimony”) at 8.

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ *Id.* at 8-9.

²⁰ See, e.g., *Commonwealth Edison Co.*, Opinion No. 165, 23 FERC ¶ 61,219 (1983).

to calculate depreciation expense for retail electric service and ensure that PSCo's depreciation rates are founded upon the most recent information.

As noted above, the CoPUC approved the use of the new depreciation rates to be used in retail rates effective April 1, 2022. Through the present filing, PSCo will continue to use the same depreciation rates to calculate Utility Plant²¹ depreciation expense for both retail electric service and wholesale transmission service. Maintaining consistency between retail and wholesale jurisdictions simplifies depreciation accounting. Indeed, as noted, PSCo previously negotiated with its customers to retain the right to seek consistency between depreciation rates in wholesale transmission and retail rates. Specifically, the settlement agreement in Docket Nos. ER12-1589-000, *et al.*, which established the Transmission Formula Rate, provided that "Currently the depreciation rates for PSCo's retail and FERC jurisdictions are the same. PSCo will actively pursue any filings necessary to keep such rates synchronized."²²

The depreciation rates presently used in Table 25 no longer reflect the most recent information. The original analytical foundation for the current depreciation rates in Table 25 was a study performed in 2015, using actual plant balances as of September 30, 2015, but the rates produced by the study were modified pursuant to a settlement reached in a CoPUC proceeding in 2016.²³ Due to delays in implementing the depreciation rates at retail, PSCo did not seek to incorporate those depreciation rates into its Commission-jurisdictional transmission formula rate until the fourth quarter of the 2019, when PSCo filed revisions to the transmission formula rate in Docket No. ER20-251-000.²⁴ The depreciation rates proposed in the present filing are based upon the Depreciation Rate Study, which uses up-to-date information and considers plant balances as of December 31, 2020.²⁵

In the enclosed tariff records, PSCo is modifying the depreciation rates stated in Table 25 to the Template and used to calculate PSCo's depreciation expense, which is then used in the determination of PSCo's Annual Transmission Revenue Requirement ("ATRR") and transmission rates, including ancillary service rates.

²¹ For ease of reference, the term "depreciation rates" or "Utility Plant" is used in this proceeding to refer to the Company's depreciation and amortization of all utility plant accounts, including (1) Production Plant, (2) Transmission Plant, (3) Electric General Plant, and (4) Common General Plant, including Intangible Plant. It should be noted, however, that certain of the Company's intangible plant accounts are amortized, and not depreciated through the use of approved depreciation rates. Thus, in many contexts, the term "depreciation rates" also includes the amortization periods applicable to accounts that are amortized, and not depreciated.

²² Stipulation and Offer of Partial Settlement at § D.2, Docket No. ER12-1589-000, *et al.* (Oct. 7, 2013).

²³ Wold Direct Testimony at 6.

²⁴ The Commission accepted the revised depreciation rates on January 23, 2020. *Public Service Company of Colorado*, unpublished letter order, Docket No. ER20-251-000 (Jan. 23, 2020). Subsequently, PSCo made a filing in Docket No. ER20-1371-000 to change the effective date for the revised depreciation rates from January 1, 2020, to March 1, 2020.

²⁵ Wold Direct Testimony at 12-13.

PSCo acknowledges that the Commission is not bound by the determination of a state authority regarding depreciation rates and may conduct its own review. To that end, PSCo encloses the Depreciation Rate Study provided to the CoPUC, the Settlement Agreement approved by the CoPUC and the CoPUC Decision approving the Settlement Agreement to support the change in depreciation rates.²⁶ The Commission has noted that, in reviewing depreciation rate changes, it may review the depreciation study used by the state authority and does not require an entirely new “wholesale” depreciation study.²⁷ The Depreciation Rate Study, Settlement Agreement and CoPUC Order are discussed below.

The depreciation rates for Utility Plant approved by the CoPUC as just and reasonable and in the public interest and are the depreciation rates PSCo proposes to incorporate in Table 25 in this instant filing.

B. The Depreciation Rate Study

At PSCo’s request, Alliance conducted a depreciation study (“Depreciation Rate Study”), which was submitted to the CoPUC as part of PSCo’s application in CoPUC Proceeding No. 21AL-0317E. The testimony of Laurie J. Wold, Senior Manager, Capital Asset Accounting at XES, presents the Depreciation Rate Study. Ms. Wold summarizes the methodology and conclusions of the Depreciation Rate Study. The Testimony of Ms. Wold is attached as Exhibit No. XES – 200 and the Depreciation Study is attached as Exhibit No. XES – 201 to this filing.

The Depreciation Rate Study evaluated PSCo’s electric and common utility plant depreciable assets using actual plant asset balances as of December 31, 2020. The Depreciation Rate Study’s methodology was based on average remaining life calculations and net salvage rates, derived using assumptions consistent with the Commission’s long-standing precedent for Broad (Average) Life Group straight-line depreciation.²⁸

As Ms. Wold notes, the Depreciation Rate Study analyzed five general classes, or functional groups, of PSCo’s depreciable property: (1) Production Plant, (2) Transmission Plant, (3) Distribution Plant, (4) Electric General Plant, and (5) Common General Plant property.²⁹ Within production plant, the Depreciation Rate Study considered PSCo’s existing plant as well as new production plant: PSCo’s Valmont 9 & 10 that went in-service in 2021 and PSCo’s Manchief plant which is being acquired from Southwest Generation Operating Company, LLC in 2022.³⁰ In

²⁶ See Exhibit Nos. XES-201, 202, and 203.

²⁷ *Westar Energy, Inc.*, 131 FERC ¶ 61,183 at P 20 (2010).

²⁸ See Wold Direct Testimony at 13. See also *Depreciation Accounting*, Order No. 618, Reg. Preambles ¶ 31,104 (2000) (explaining the Commission’s traditional policy preference for straight line depreciation).

²⁹ Wold Direct Testimony at 3.

³⁰ See Wold Testimony at 11. The Commission authorized PSCo’s acquisition of the Manchief plant in 2020. See *Public Service Company of Colorado*, 169 FERC ¶ 62,040 (2020).

addition, the common assets for the Comanche coal-fired generating units are separated between Comanche Unit 3 and the early-retiring Comanche Units 1 and 2.³¹

The formula to derive depreciation rates calculates annual depreciation accrual amounts for each group by dividing the original cost of the asset (gross plant), less allocated depreciation reserve, less estimated net salvage, by the group's respective remaining life.³² The resulting annual accrual amounts for all depreciable property within an account are accumulated, and the total is divided by the original cost (gross plant) of all depreciable property within the account to determine the depreciation rate.³³ As part of the calculation of the depreciation rates, the Depreciation Rate Study re-examined and adjusted estimates of average service lives for PSCo plant³⁴ and net salvage percentages,³⁵ and performed remaining life analysis³⁶ and a depreciation reserve reallocation.³⁷

Ms. Wold's testimony and the Depreciation Rate Study support the proposed changes in the depreciation accrual rates. Based on the revised depreciation rates, the overall change in PSCos' total system depreciation and amortization expense is \$49.5 million.³⁸ The most significant change in depreciation expense, an increase of \$28.6 million, is related to Production Plant, and primarily to the \$18.8 million increase for Steam Production Plant.³⁹ Changes in depreciation expense related to Production Plant include the average remaining life depreciation rates associated with the current terminal retirement dates, plant balances, reserve position, and the incorporation of new decommissioning cost estimates for all Production assets.⁴⁰ The actual rate impact to customers under the Tariff is discussed in Section III.A, *infra*.

³¹ The Commission has previously accepted changes to implement regulatory assets in association with the early retirements of Comanche Units 1 and 2. In particular, on June 27, 2019, in Docket No. ER19-2272-000, PSCo filed changes to establish regulatory assets in the Production Formula Rate Template for costs associated with the early retirements of Comanche Units 1 and 2 coal-fired generating units, and associated Comanche Common assets. The Commission accepted these changes on August 26, 2019. *Public Service Company of Colorado*, unpublished letter order, Docket No. ER19-2272-000 (Aug. 26, 2019).

³² Wold Direct Testimony at 15.

³³ *Id.*

³⁴ *Id.* at 28-31.

³⁵ *Id.* at 22-26.

³⁶ *Id.* at 22.

³⁷ Wold Direct Testimony at 18. If the accumulated book depreciation reserve – as compared to the theoretical reserve – results in some assets being over-recovered and others being under-recovered within a functional class or group, this difference can be used to rebalance the accounts within the functional class or group using the reserve reallocation. *See id.* Ms. Wold notes that depreciation reserve reallocation is consistent with guidance and has been accepted in other depreciation rate filings at the Commission. *See id.* at 19.

³⁸ Wold Direct Testimony at 35.

³⁹ *Id.* at 35-36.

⁴⁰ *Id.* at 36.

C. The Changes to Table 25 of the Transmission Formula Rate Template

PSCo is modifying the Utility Plant depreciation rates set forth in Table 25 (Work Paper H-1) “Depreciation and Amortization Rates” in Attachment O-PSCo to be equal to the depreciation rates approved by the CoPUC. Table 25 provides a list of all of PSCo’s depreciation rates, by account, for transmission plant, electric general plant, common general plant, and common intangible plant. Table 25 also lists the distribution depreciation rates for customer reference, even though distribution depreciation rates are not directly used in calculating rates under the Attachment O-PSCo. The changes to Table 25 to reflect the revised depreciation rates are discussed in the testimony of Arthur P. Freitas, Manager of Revenue Analysis at XES. The Template changes will increase PSCo’s total 2022 actual ATRR and preserve the synchronization of the depreciation rates applicable to retail and wholesale customers, consistent with the settlement in Docket No. ER12-1589-000 *et al.*⁴¹ The Testimony of Mr. Freitas is attached as Exhibit No. XES – 300 and the annualized customer impact of the proposed depreciation rate change is attached as Exhibit No. XES – 301 to this filing.

D. Notification to Affected Customers

PSCo provided notice of this filing to affected customers as expeditiously as possible. On March 16, 2022, the CoPUC held public deliberations with respect to Proceeding No. 21AL-0317E where the CoPUC verbally approved the Settlement Agreement. Prior to the CoPUC’s deliberations on March 16, it was unclear whether the CoPUC would approve the Settlement Agreement or require further changes to the depreciation rates. For example, it was possible that the CoPUC might have made findings that did not accept some of the proposed depreciation rates or otherwise requiring the depreciation rates to be modified from those proposed. As an example, the CoPUC did not approve the depreciation related issues for the early retirements of Craig and Hayden, and so that aspect of the initial retail rate case is not included in this instant filing. However, following the CoPUC’s March 16 deliberations, PSCo had sufficient certainty that the depreciation rates supported by the Depreciation Rate Study would be approved by the CoPUC and was able to estimate the financial impacts of the change in depreciation rates. PSCo sent notice to its transmission and wholesale production customers on March 18, 2022. On March 23, 2022, PSCo met with its transmission and wholesale production customers to discuss pending changes to the Template, including the instant filing, and the estimated financial impact of those changes. PSCo requested that customers notify PSCo of any objection to the requested date, and no customer has indicated opposition to this filing or the requested effective date.

⁴¹ PSCo includes a new note in Table 25 indicating PSCo will reflect the revised Utility Plant depreciation rates when calculating the 2018 Annual True-up.

III. INFORMATION RELATING TO THE EFFECT OF THE RATE CHANGE

A. Impact of Tariff Changes

The Commission has noted that changes in depreciation accrual rates affect the timing of recovery of the costs and do not change the overall amount of recovery.⁴² Due to the changes in the depreciation rates, customers will experience an increase in the near-term in the depreciation expense in their rates. As discussed in more detail in the testimony of Mr. Freitas, the depreciation rate revisions to Table 25 are expected to increase the 2022 Annual Transmission Revenue Requirement by approximately \$6.1 million. The majority of this increase is allocated to PSCo's retail customers. The rate change is estimated increase PSCo's wholesale transmission NITS customers' annual transmission charge by \$906,740 or 2.04 percent. The impact to non-production Ancillary Services customers is an increase of \$234,718 or 1.34 percent.⁴³

The overall change in Utility Plant annual transmission-related depreciation and amortization expense is an increase of \$14.5 million for the PSCo system, calculated on an annualized basis.⁴⁴ Of the \$14.5 million total depreciation expense change, \$5.6 million is for transmission assets which is direct assigned to the transmission function, \$7 million is related to general plant and \$2 million is related to common plant. General and common plant is allocated to the transmission function, 10.6 percent and 7.5 percent, respectively.⁴⁵ The wholesale transmission customers taking service under the Tariff are approximately fifteen (15) percent of the total transmission loads on the PSCo system. As such, the impact of the revising the Utility Plant depreciation rates in Table 25 is expected to be an annual rate increase to wholesale transmission service customers of about \$0.9 million on an annualized basis.⁴⁶ The \$0.9 million compares to total 2022 estimated PSCo ATRR of approximately \$299.9 million, of which approximately \$44.4 million is recovered from wholesale transmission service customers.⁴⁷ Thus, the annual rate impact to PSCo transmission customers is an ATRR increase of 2.04 percent compared to the ATRR calculated using the currently effective depreciation rates.⁴⁸

Since PSCo's ancillary services rates are calculated by formulas using historic actual costs and loads, the revisions to the ancillary services portions of the Template will affect the calculation of the rates for Schedules 2, 3, 3A, 5, 6 and 16 in the 2024 rate year (effective January 1, 2024),

⁴² *Ameren Illinois Co.*, 141 FERC ¶ 61,264 at P 32 (2012).

⁴³ Wholesale customers that are also production customers receive revenue credits in their production rate for ancillary service charged under the transmission rate and therefore there is no impact to these customers for the change in ancillary service rates.

⁴⁴ Freitas Direct Testimony at 9.

⁴⁵ *Id.* at 10.

⁴⁶ *Id.*

⁴⁷ *Id.*

⁴⁸ *Id.*

when the rates are calculated using 2022 actual costs and loads.⁴⁹ The total impact to Ancillary Services customers is an increase of approximately \$329,000 out of total ancillary service charges of \$23.2 million, or 1.4 percent. However, four of PSCo's ancillary service customers also take service under PSCo's Assured Power Tariff (i.e., its production formula tariff) and, as a result, receive a revenue credit for all generation based ancillary services charged under the transmission formula. The net impact to the remaining Ancillary Services customers is an increase of \$234,000 out of \$17.5 million in total charges, or an increase of 1.34 percent.

B. Requested Effective Date/Request for Waiver

PSCo proposes that the Revised Template become effective April 1, 2022, which is one (1) day after filing, consistent with the date established by the CoPUC for the effectiveness of the new depreciation rates at retail, but PSCo proposes to defer implementing the rate change for 2022 charges until the true-up for the 2022 rate year. PSCo's transmission formula uses a January-December rate year. Rather than implement a mid-year rate change, PSCo proposes to apply the revised depreciation rates in the annual true-up reflecting an April 1, 2022 effective date. This will impact customer bills at the end of 2023. PSCo also would utilize the depreciation rates in estimated rates starting in January 2023. This approach will enable PSCo to keep its depreciation rates at the retail and wholesale levels aligned for ratemaking while mitigating rate impacts on customers.

In light of PSCo's proposed deferral of the collection of the revised depreciation rates in transmission rates until January 2023, PSCo's customers will not experience a rate impact from this filing for eight months. Nevertheless, to the extent necessary, PSCo respectfully requests waiver of the Commission's notice requirement⁵⁰ pursuant to 18 C.F.R. § 35.11 so that the revised Template may be accepted, without modification or condition, with an effective date of April 1, 2022, to be implemented as discussed above.

Out of an abundance of caution, PSCo also respectfully requests waiver of Section 10 of the Protocols, which: (1) calls for PSCo to provide its transmission customers with notice of any proposed filing to modify or terminate the transmission formula rate under section 205 of the Federal Power Act at least thirty (30) calendar days prior to making such filing, and (2) provides that proposed modifications or termination of the transmission formula rate be coincident with the beginning of the next Rate Year unless PSCo and its transmission customers mutually agree otherwise.⁵¹ Since PSCo proposes to defer implementation of the revised depreciation rates until the true-up, a waiver of section 10 of the protocols is arguably unnecessary, but PSCo provides the following discussion for the Commission's consideration. Good cause exists to grant PSCo's requested April 1, 2022 effective date, and PSCo's request satisfies the Commission's criteria for

⁴⁹ *Id.*

⁵⁰ 18 C.F.R. § 35.3(a).

⁵¹ PSCo discussed the instant filing at its meeting on March 23, 2022, and no customer disagreed with the proposed effective date of April 1, 2022. Accordingly, PSCo believes it has agreement from its customers as to the proposed effective date but, to the extent necessary, requests waiver of this provision of Section 10 of the Protocols as well.

granting such tariff waivers. The Commission has granted waiver of tariff provisions where: (1) the applicant acted in good faith; (2) the waiver is of limited scope; (3) the waiver addresses a concrete problem; and (4) the waiver does not have undesirable consequences, such as harming third parties.⁵²

First, PSCo has acted in good faith because it provided notice of this filing and the estimated financial impacts of the filing to its transmission and wholesale production customers within two (2) days of the CoPUC's verbal approval of the Settlement Agreement, which occurred on March 16, 2022. Prior to the CoPUC's deliberations on March 16, 2022, PSCo was unable to provide an accurate estimate of the financial impact of the change in depreciation rates in part because the CoPUC is not bound by the Settlement Agreement and the approved rates were not known. PSCo also needed to understand how the CoPUC would evaluate the appropriate approaches to recovering the remaining net book value and future decommissioning costs associated with Craig Generating Station Unit 2 and Hayden Generation Station Units 1 and 2 before it could estimate the financial impact of the CoPUC proceeding. PSCo met with its transmission and wholesale production customers the week following the CoPUC's deliberations to discuss the instant filing, and no customer indicated opposition to this filing or the requested effective date.

Second, the waiver is of limited scope because it would apply in this instance only, and only is necessary because of the specific procedural posture of the CoPUC proceeding whereby the Settlement Agreement did not resolve all issues in the proceeding and both the CoPUC's public deliberation on the Settlement Agreement and the issuance of the CoPUC's order establishing the depreciation rates occurred less than 30 days prior to the effective date of the rates established by the CoPUC.

Third, the waiver addresses a concrete problem. As explained above, PSCo has a longstanding practice of using the same depreciation rates for both retail electric services and wholesale services, which significantly simplifies PSCo's depreciation accounting. If the requested waivers are not granted, PSCo will for the first time since the creation of its transmission formula rate maintain separate accounting for retail electric services and wholesale services at great expense to the company. Different depreciation rates for retail and wholesale services would also create additional complexity for customers when reviewing PSCo's formula rate because additional information would need to be included in PSCo's FERC Form No. 1 to list the wholesale amounts for any financial item affected by depreciation rates (e.g., depreciation expense, accumulated depreciation, excess ADIT and amortization). Keeping these rates synchronized was in fact part of the settlement establishing the current transmission formula rate. Specifically, the settlement agreement in Docket Nos. ER12-1589-000, *et al.*, which established the Transmission Formula Rate, provided that "Currently the depreciation rates for PSCo's retail and FERC

⁵²

See *The Empire District Electric Co.*, 166 FERC ¶ 61,164, at P 32 (2019) (granting waiver and listing the Commission's four criteria for granting tariff waivers); *Public Service Company of Colorado*, 166 FERC ¶ 61,077, at P 48 (2019); *EDP Renewables North America LLC*, 161 FERC ¶ 61,086, at P 6 (2017); *Southwest Power Pool, Inc.*, 153 FERC ¶ 61,339, at PP 17-18 (2015).

jurisdictions are the same. PSCo will actively pursue any filings necessary to keep such rates synchronized.”⁵³

Fourth, the waiver does not have undesirable consequences, such as harming third parties. The enclosed filing changes the timing of recovery of the costs of the PSCo’s plant under the filed rates, but does not change the underlying value of the assets, so there would be no risk of over- or under-recovery, particularly in the context of PSCo’s cost-based formula rate that includes a true-up.⁵⁴ In addition, the Commission has permitted waiver of the prior notice requirements for other filings that seek to align depreciation rates with the utility’s state-jurisdictional rates.⁵⁵

Lastly, the Commission has previously waived its prior notice requirement pursuant to 18 C.F.R. § 35.11 to allow PSCo to implement changes to depreciation rates with an effective date of less than sixty (60) days after filing in multiple past proceedings.⁵⁶

C. Other Requests for Waiver

PSCo also respectfully requests waiver of the requirements of 18 C.F.R. § 35.13 to the extent the rules would require the submission of cost-of-service statements in support of the enclosed revisions to the Tariff. Specifically, PSCo requests waiver of the following sections of the Commission’s regulations: Sections 35.13(d)(1)-(2) (Period I and II data for Statements AA through BM), Section 35.13(d)(5) (workpapers related to Period I and II data), and Section 35.13(h) (cost-of-service statements).⁵⁷ Good cause exists to grant these waivers. Detailed statements of PSCo’s cost of service are not needed because the currently effective Template already calculates the rates for transmission service on a formulaic basis and is trued-up each year to PSCo’s actual costs. Moreover, granting waiver would be consistent with waivers granted by the Commission in similar cases.⁵⁸

PSCo respectfully requests the Commission recognize that PSCo has endeavored to comply fully with the Commission’s filing requirements set forth in Part 35 of the Commission’s regulations. In the event that the Commission, upon review of the filing, should find that PSCo

⁵³ Stipulation and Offer of Partial Settlement at § D.2, Docket No. ER12-1589-000, et al. (Oct. 7, 2013).

⁵⁴ See, e.g., *Ameren Illinois Co.* 141 FERC ¶ 61,264 at P 32 (2012).

⁵⁵ See *Niagara Mohawk Power Corp.*, letter order, Docket No. ER19-32-000 (Dec. 4, 2018); *Florida Power Corp.*, 134 FERC ¶ 61,145 (2011); *Niagara Mohawk Power Corp.*, letter order, Docket No. ER12-1394-000 (May 29, 2012).

⁵⁶ See, e.g., *Public Service Company of Colorado*, Docket No. ER16-1730-000 (June 30, 2016) (delegated letter order) (granting waiver of Commission’s notice requirements pursuant to 18 C.F.R. § 35.11 to allow depreciation rates to go into effect at the same time as the depreciation rates established in a CoPUC proceeding); *Public Service Company of Colorado*, Docket No. ER19-2077-000 (Sept. 11, 2019) (delegated letter order) (same); *Public Service Company of Colorado*, Docket No. ER20-1371-000 (May 4, 2020) (delegated letter order) (same).

⁵⁷ See 18 C.F.R. §§ 35.13(d)(1)(2), (d)(5), and (h) (2017).

⁵⁸ See, e.g., *Westar Energy, Inc.*, 131 FERC ¶ 61,183 at P 21 (2010) (granting waiver of cost-of-service statements for proposed change in depreciation rates).

has misinterpreted or failed to respond in some detail to such filing requirements, PSCo requests that the Commission waive any failure to comply strictly with such filing requirements in recognition of PSCo's good faith attempt at compliance.

IV. ADDITIONAL INFORMATION SUBMITTED IN SUPPORT OF FILING

A. Information Required by Section 35.13 of the Commission's Regulations, 18 C.F.R. § 35.13

1. Contents of Filing – Section 35.13(b)(1)

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

- Exhibit No. XES – 100: revised tables and workpapers to the Attachment O-PSCo Transmission Formula Rate Template in clean eTariff format;
- Exhibit No. XES – 101: revised tables and workpapers to the Attachment O-PSCo Transmission Formula Rate Template in marked format;
- Exhibit No. XES – 200: the Direct Testimony of Ms. Laurie J. Wold of XES;
- Exhibit No. XES – 201: Public Service Company of Colorado – Electric and Common Utility Plant Depreciation Rate Study at December 31, 2020, conducted by Alliance Consulting Group, CoPUC Proceeding No. 21AL-0317E;
- Exhibit No. XES – 202: Unopposed and Comprehensive Settlement Agreement (Except as to One Issue), CoPUC Proceeding No. 21AL-0317E;
- Exhibit No. XES – 203: CoPUC Decision Approving Settlement, Proceeding No. 21AL-0317E;
- Exhibit No. XES – 300: the Direct Testimony of Mr. Arthur P. Freitas of XES; and
- Exhibit No. XES – 301: Transmission Customer Annual Revenue Impacts

2. The Names and Addresses of Persons to Whom a Copy of the Rate Change Has Been Posted – Section 35.13(b)(3)

An electronic notice of this filing will be served on the Colorado Public Utilities commission and all affected PSCo transmission service customers taking service under the Tariff. A courtesy copy will be served on the Director, Division of Electric Power Regulation (West). In addition, a copy of this filing will be available at the offices of PSCo at 1800 Larimer Street, Denver, Colorado.

3. Brief Description of Rate Change – Section 35.13(b)(4)

See Sections II and III above.

4. Statement of Reasons for Rate Change – Section 35.13(b)(5)

See Sections II and III above.

5. Requisite Agreement for Rate Change – Section 35.13(b)(6)

See Section II above.

6. Statement Showing Expenses or Costs Included in Cost-of-Service Statements – Section 35.13(b)(7)

None of the costs related to this filing have been alleged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs that are demonstrably the product of discriminatory practices.

B. Communications

Correspondence and communications with respect to this filing should be sent to, and XES requests the Secretary include on the official service list, the following:⁵⁹

Deborah Blair
Director, Revenue Analysis
Xcel Energy Services Inc.
1800 Larimer St, Suite 1400
Denver, CO 80202
Telephone: (303) 294-2184
Email: Deborah.Blair@xcelenergy.com

Liam Noailles
Manager, Federal Regulatory Affairs
Xcel Energy Services Inc.
1800 Larimer St, Suite 1200
Denver, CO 80202
Telephone: (303) 571-2794
Email: Liam.D.Noailles@xcelenergy.com

David E. Pettit
Assistant General Counsel
Xcel Energy Services Inc.
1800 Larimer Street, Suite 1400
Denver, CO 80202
Telephone: (303) 294-2599
Email: David.E.Pettit@xcelenergy.com

Laurie J. Wold
Senior Manager, Capital Asset Accounting
Xcel Energy Services Inc.
414 Nicollet Mall – 401- 3
Minneapolis, MN 55401
Telephone: (612) 330-5510
Email: Laurie.J.Wold@xcelenergy.com

⁵⁹ To the extent necessary, XES and PSCo respectfully request waiver of Rule 203(b)(3) of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.203(b), to permit all of the persons listed to be placed on the official service list for this proceeding.

The Honorable Kimberly D. Bose

March 31, 2022

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V. CONCLUSION

For the reasons stated above, the PSCo respectfully requests that the Commission accept the revised e-Tariff records to Table 25 of the Template and grant the waiver requested herein so that the revisions may be effective on April 1, 2022, without suspension or hearing, with collection of the revised depreciation rates deferred until the true-up for the 2022 rate year.

Please direct any questions regarding this filing to the undersigned.

Respectfully submitted,

/s/ Liam Noailles

Liam Noailles

Manager, Federal Regulatory Affairs

Xcel Energy Services Inc.

1800 Larimer St, Suite 1200

Denver, CO 80202

Telephone: (303) 571-2794

Email: Liam.D.Noailles@xcelenergy.com

Cc: Colorado Public Utilities Commission
Director, Division of Tariffs and Market Development (West)
Transmission Tariff Customers

CERTIFICATE OF SERVICE

I, Elizabeth A. Walkup, hereby certify that I have this day served a notice of the enclosed document filing, electronically, on the Colorado Public Utilities Commission and each party designated on the official service list compiled by the Secretary in this proceeding.

Dated at Minneapolis, Minnesota this 31st day of March, 2022.

/s/ Elizabeth Walkup

Elizabeth A. Walkup

Xcel Energy Services Inc.

Transmission Business Analyst

414 Nicollet Mall, MP08

Minneapolis, MN 55401

(612) 330-6780

Elizabeth.A.Walkup @xcelenergy.com

Exhibit No. XES - 100

Revised Tables and Workpapers to the Attachment
O-PSCo Transmission Formula Rate Template in
clean eTariff Format

Proposed Effective Date: 4-1-2022

Public Service Company of Colorado
Transmission Formula Rate Settlement Template
Twelve Months Ended December 31, 20XX
Depreciation and Amortization Rates
Utility Plant, Regulatory Assets, & Regulatory Liabilities

Table 25
WP_H-1

FERC Account	Name	Depreciation/ Amortization Rate (%)
Electric Plant Acquisition Adjustment- Calpine Acquisition		
114	Transmission Serving Transmission	
	Rocky Mountain Energy Center-Amortization of 55 years ending in 2065.	1.8182%

Unit or Account Number	Account Number and / or Description	Total Depreciation Rate	Notes
ELECTRIC INTANGIBLE PLANT			
301.00	Organization Costs		
302.00	Franchises and Consents		(1)
303.00	Miscellaneous Intangible Plant		(1)
303.40	Misc Computer Software - 3 Year	33.3333%	
303.40	Misc Computer Software - 7 Year	14.2857%	
303.40	Misc Computer Software - 10 Year	10.0000%	
303.40	Misc Computer Software - 15 Year	6.6667%	
STEAM PRODUCTION PLANT			
Cameo Common	310.2 Land Rights	0.0000%	
Cherokee Unit 2 SC	314 Turbogenerator Units	5.5878%	
Cherokee Unit 2 SC	315 Accessory Electric Equipment	4.9323%	
Cherokee Unit 4	311 Structures and Improvements	4.9152%	
Cherokee Unit 4	312 Boiler Plant Equipment	5.4682%	
Cherokee Unit 4	312 Boiler Plant Equipment AQIR	6.1689%	
Cherokee Unit 4	314 Turbogenerator Units	5.5651%	
Cherokee Unit 4	315 Accessory Electric Equipment	4.6053%	
Cherokee Unit 4	315.2 Computers and Peripherals	11.1111%	
Cherokee Unit 4	316 Miscellaneous Power Plant Equipment	8.3495%	
Cherokee Common	310.2 Land Rights	4.4992%	
Cherokee Common	310.3 Water Rights	5.7036%	
Cherokee Common	311 Structures and Improvements	7.5486%	
Cherokee Common	312 Boiler Plant Equipment	8.3481%	
Cherokee Common	312 Boiler Plant Equipment AQIR	6.3591%	

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Cherokee Common	314 Turbogenerator Units	5.5800%
Cherokee Common	315 Accessory Electric Equipment	5.2505%
Cherokee Common	315.2 Computers and Peripherals	11.1111%
Cherokee Common	316 Miscellaneous Power Plant Equipment	6.4923%
Coal Cars	312 Boiler Plant Equipment	4.5597%
Comanche Unit 1	311 Structures and Improvements	3.2460%
Comanche Unit 1	312 Boiler Plant Equipment	4.1647%
Comanche Unit 1	314 Turbogenerator Units	3.9115%
Comanche Unit 1	315 Accessory Electric Equipment	3.6630%
Comanche Unit 1	315.2 Computers and Peripherals	11.1111%
Comanche Unit 1	316 Miscellaneous Power Plant Equipment	5.5684%
Comanche Unit 2	311 Structures and Improvements	3.1168%
Comanche Unit 2	312 Boiler Plant Equipment	3.9115%
Comanche Unit 2	314 Turbogenerator Units	4.1580%
Comanche Unit 2	315 Accessory Electric Equipment	3.9130%
Comanche Unit 2	315.2 Computers and Peripherals	11.1111%
Comanche Unit 2	316 Miscellaneous Power Plant Equipment	4.0784%
Comanche Unit 3	310.2 Land Rights	1.6336%
Comanche Unit 3	311 Structures and Improvements	1.9656%
Comanche Unit 3	312 Boiler Plant Equipment	2.4394%
Comanche Unit 3	314 Turbogenerator Units	2.1352%
Comanche Unit 3	315 Accessory Electric Equipment	1.9390%
Comanche Unit 3	315.2 Computers and Peripherals	11.1111%
Comanche Unit 3	316 Miscellaneous Power Plant Equipment	4.0784%
Comanche Common Retire w/ Unit 1&2	311 Structures and Improvements	5.3599%
Comanche Common Retire w/ Unit 1&2	312 Boiler Plant Equipment	7.3865%
Comanche Common Retire w/ Unit 1&2	314 Turbogenerator Units	7.1471%
Comanche Common Retire w/ Unit 1&2	315 Accessory Electric Equipment	9.1479%
Comanche Common Retire w/ Unit 1&2	315.2 Computers and Peripherals	11.1111%
Comanche Common Retire w/ Unit 1&2	316 Miscellaneous Power Plant Equipment	12.0629%
Comanche Common Retire w/ Unit 3	311 Structures and Improvements	3.3339%
Comanche Common Retire w/ Unit 3	312 Boiler Plant Equipment	3.8530%
Comanche Common Retire w/ Unit 3	314 Turbogenerator Units	3.5119%
Comanche Common Retire w/ Unit 3	315 Accessory Electric Equipment	3.3698%
Comanche Common Retire w/ Unit 3	315.2 Computers and Peripherals	11.1111%
Comanche Common Retire w/ Unit 3	316 Miscellaneous Power Plant Equipment	4.5634%

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Craig Unit 1	311 Structures and Improvements	4.6361%
Craig Unit 1	312 Boiler Plant Equipment	4.5596%
Craig Unit 1	314 Turbogenerator Units	9.8769%
Craig Unit 1	315 Accessory Electric Equipment	5.1425%
Craig Unit 1	315.2 Computers and Peripherals	11.1111%
Craig Unit 1	316 Miscellaneous Power Plant Equipment	3.8776%
Craig Unit 2	311 Structures and Improvements	2.3969%
Craig Unit 2	312 Boiler Plant Equipment	4.1690%
Craig Unit 2	314 Turbogenerator Units	3.4852%
Craig Unit 2	315 Accessory Electric Equipment	2.5064%
Craig Unit 2	315.2 Computers and Peripherals	11.1111%
Craig Unit 2	316 Miscellaneous Power Plant Equipment	3.1843%
Craig Common	311 Structures and Improvements	3.0374%
Craig Common	312 Boiler Plant Equipment	3.8261%
Craig Common	314 Turbogenerator Units	3.6220%
Craig Common	315 Accessory Electric Equipment	3.1351%
Craig Common	315.2 Computers and Peripherals	11.1111%
Craig Common	316 Miscellaneous Power Plant Equipment	4.4914%
Hayden Unit 1	311 Structures and Improvements	2.7765%
Hayden Unit 1	312 Boiler Plant Equipment	6.1700%
Hayden Unit 1	314 Turbogenerator Units	4.6638%
Hayden Unit 1	315 Accessory Electric Equipment	3.4811%
Hayden Unit 1	315.2 Computers and Peripherals	11.1111%
Hayden Unit 1	316 Miscellaneous Power Plant Equipment	5.0777%
Hayden Unit 2	311 Structures and Improvements	3.6573%
Hayden Unit 2	312 Boiler Plant Equipment	4.1914%
Hayden Unit 2	314 Turbogenerator Units	3.4567%
Hayden Unit 2	315 Accessory Electric Equipment	2.8917%
Hayden Unit 2	315.2 Computers and Peripherals	11.1111%
Hayden Unit 2	316 Miscellaneous Power Plant Equipment	5.2228%
Hayden Common	311 Structures and Improvements	5.8966%
Hayden Common	312 Boiler Plant Equipment	4.8586%
Hayden Common	314 Turbogenerator Units	5.2379%
Hayden Common	315 Accessory Electric Equipment	5.2611%
Hayden Common	315.2 Computers and Peripherals	11.1111%
Hayden Common	316 Miscellaneous Power Plant Equipment	6.4756%
Pawnee Unit 1	311 Structures and Improvements	2.2067%
Pawnee Unit 1	312 Boiler Plant Equipment	3.7674%
Pawnee Unit 1	314 Turbogenerator Units	3.1836%
Pawnee Unit 1	315 Accessory Electric Equipment	2.4134%
Pawnee Unit 1	315.2 Computers and Peripherals	11.1111%

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Pawnee Unit 1	316 Miscellaneous Power Plant Equipment	2.9385%
Pawnee Common	311 Structures and Improvements	9.0795%
Pawnee Common	312 Boiler Plant Equipment	8.1408%
Pawnee Common	314 Turbogenerator Units	7.4947%
Pawnee Common	315 Accessory Electric Equipment	2.9011%
Pawnee Common	315.2 Computers and Peripherals	11.1111%
Pawnee Common	316 Miscellaneous Power Plant Equipment	8.2847%

Zuni Common	310.3 Water Rights	0.0000%

HYDRAULIC PRODUCTION PLANT

Ames	331 Structures and Improvements	5.1169%
Ames	332 Reservoirs, Dams and Waterways	4.7359%
Ames	333 Waterwheels, Turbines and Generators	5.8801%
Ames	334 Accessory Electric Equipment	5.1027%
Ames	334.2 Computers and Peripherals	11.1111%
Ames	335 Misc. Power Plant Equipment	4.7125%
Ames	335.2 Recreational Facilities	4.6540%
Ames	336 Roads, Railroads and Bridges	4.6657%
Cabin Creek	331 Structures and Improvements	4.8042%
Cabin Creek	332 Reservoirs, Dams and Waterways	5.4031%
Cabin Creek	333 Waterwheels, Turbines and Generators	5.1479%
Cabin Creek	334 Accessory Electric Equipment	5.6077%
Cabin Creek	334.2 Computers and Peripherals	11.1111%
Cabin Creek	335 Misc. Power Plant Equipment	4.8523%
Cabin Creek	335.2 Recreational Facilities	4.5137%
Cabin Creek	336 Roads, Railroads and Bridges	5.3539%
Georgetown	331 Structures and Improvements	5.7437%
Georgetown	332 Reservoirs, Dams and Waterways	7.0424%
Georgetown	333 Waterwheels, Turbines and Generators	8.1383%
Georgetown	334 Accessory Electric Equipment	6.5693%
Georgetown	334.2 Computers and Peripherals	11.1111%
Georgetown	335 Misc. Power Plant Equipment	5.7898%
Georgetown	335.2 Recreational Facilities	5.9691%
Georgetown	336 Roads, Railroads and Bridges	7.0295%
Salida	331 Structures and Improvements	36.4118%
Salida	332 Reservoirs, Dams and Waterways	38.6387%
Salida	333 Waterwheels, Turbines and Generators	36.7841%
Salida	334 Accessory Electric Equipment	36.6599%
Salida	334.2 Computers and Peripherals	11.1111%
Salida	335 Misc. Power Plant Equipment	32.4667%
Salida	335.2 Recreational Facilities	34.6890%

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Salida	336 Roads, Railroads and Bridges	36.0175%
Shoshone	331 Structures and Improvements	2.5232%
Shoshone	332 Reservoirs, Dams and Waterways	2.9011%
Shoshone	333 Waterwheels, Turbines and Generators	2.9300%
Shoshone	334 Accessory Electric Equipment	3.0493%
Shoshone	334.2 Computers and Peripherals	11.1111%
Shoshone	335 Misc. Power Plant Equipment	2.5296%
Shoshone	335.2 Recreational Facilities	2.8558%
Shoshone	336 Roads, Railroads and Bridges	3.7741%
Tacoma	331 Structures and Improvements	3.8377%
Tacoma	332 Reservoirs, Dams and Waterways	4.3681%
Tacoma	333 Waterwheels, Turbines and Generators	4.2053%
Tacoma	334 Accessory Electric Equipment	4.6708%
Tacoma	334.2 Computers and Peripherals	11.1111%
Tacoma	335 Misc. Power Plant Equipment	4.1986%
Tacoma	335.2 Recreational Facilities	4.1124%
Tacoma	336 Roads, Railroads and Bridges	4.3052%
OTHER PRODUCTION PLANT		
Alamosa	341 Structures and Improvements	5.3990%
Alamosa	342 Fuel Holders, Producers, and Accessories	2.4185%
Alamosa	343 Prime Movers	4.1047%
Alamosa	344 Generators	3.3262%
Alamosa	345 Accessory Electric Equipment	8.2887%
Alamosa	345.2 Computers and Peripherals	16.6667%
Alamosa	346 Miscellaneous Power Plant Equipment	9.6714%
Blue Spruce	341 Structures and Improvements	2.9417%
Blue Spruce	342 Fuel Holders, Producers, and Accessories	2.9417%
Blue Spruce	343 Prime Movers	2.9417%
Blue Spruce	344 Generators	2.9407%
Blue Spruce	345 Accessory Electric Equipment	3.1596%
Blue Spruce	345.2 Computers and Peripherals	16.6667%
Blue Spruce	346 Miscellaneous Power Plant Equipment	2.9417%
Cherokee 5-7	341 Structures and Improvements	2.7351%
Cherokee 5-7	342 Fuel Holders, Producers, and Accessories	2.6342%
Cherokee 5-7	343 Prime Movers	2.9972%
Cherokee 5-7	344 Generators	2.9351%
Cherokee 5-7	345 Accessory Electric Equipment	2.7593%
Cherokee 5-7	345.2 Computers and Peripherals	16.6667%
Cherokee 5-7	346 Miscellaneous Power Plant Equipment	3.6845%

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Cheyenne Ridge Wind	340 Land Rights	4.0000%
Cheyenne Ridge Wind	341 Structures and Improvements	4.1134%
Cheyenne Ridge Wind	342 Fuel Holders, Producers, and Accessories	4.1134%
Cheyenne Ridge Wind	343 Prime Movers	N/A
Cheyenne Ridge Wind	344 Generators	4.1134%
Cheyenne Ridge Wind	345 Accessory Electric Equipment	4.1134%
Cheyenne Ridge Wind	345.2 Computers and Peripherals	N/A
Cheyenne Ridge Wind	346 Miscellaneous Power Plant Equipment	4.1134%
Fruita	340 Land Rights	1.8455%
Fruita	341 Structures and Improvements	3.0086%
Fruita	342 Fuel Holders, Producers, and Accessories	5.2835%
Fruita	343 Prime Movers	4.2273%
Fruita	344 Generators	3.5338%
Fruita	345 Accessory Electric Equipment	6.4101%
Fruita	345.2 Computers and Peripherals	16.6667%
Fruita	346 Miscellaneous Power Plant Equipment	9.5135%
Ft Saint Vrain Unit 1	341 Structures and Improvements	2.0582%
Ft Saint Vrain Unit 1	342 Fuel Holders, Producers, and Accessories	2.5676%
Ft Saint Vrain Unit 1	343 Prime Movers	4.7654%
Ft Saint Vrain Unit 1	344 Generators	2.7455%
Ft Saint Vrain Unit 1	345 Accessory Electric Equipment	2.8614%
Ft Saint Vrain Unit 1	345.2 Computers and Peripherals	16.6667%
Ft Saint Vrain Unit 1	346 Miscellaneous Power Plant Equipment	3.5418%
Ft Saint Vrain Unit 2	341 Structures and Improvements	4.3423%
Ft Saint Vrain Unit 2	342 Fuel Holders, Producers, and Accessories	3.8359%
Ft Saint Vrain Unit 2	343 Prime Movers	4.2567%
Ft Saint Vrain Unit 2	344 Generators	3.0897%
Ft Saint Vrain Unit 2	345 Accessory Electric Equipment	3.9665%
Ft Saint Vrain Unit 2	345.2 Computers and Peripherals	16.6667%
Ft Saint Vrain Unit 2	346 Miscellaneous Power Plant Equipment	4.6244%
Ft Saint Vrain Unit 3	341 Structures and Improvements	4.4977%
Ft Saint Vrain Unit 3	342 Fuel Holders, Producers, and Accessories	4.1631%
Ft Saint Vrain Unit 3	343 Prime Movers	4.2551%
Ft Saint Vrain Unit 3	344 Generators	4.5580%
Ft Saint Vrain Unit 3	345 Accessory Electric Equipment	3.9189%
Ft Saint Vrain Unit 3	345.2 Computers and Peripherals	16.6667%
Ft Saint Vrain Unit 3	346 Miscellaneous Power Plant Equipment	5.1528%
Ft Saint Vrain Unit 4	341 Structures and Improvements	2.1351%
Ft Saint Vrain Unit 4	342 Fuel Holders, Producers, and Accessories	2.6789%
Ft Saint Vrain Unit 4	343 Prime Movers	4.7941%
Ft Saint Vrain Unit 4	344 Generators	3.5192%
Ft Saint Vrain Unit 4	345 Accessory Electric Equipment	2.9161%
Ft Saint Vrain Unit 4	345.2 Computers and Peripherals	16.6667%

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Ft Saint Vrain Unit 4	346 Miscellaneous Power Plant Equipment	3.6558%
Ft Saint Vrain Unit 5	341 Structures and Improvements	2.6993%
Ft Saint Vrain Unit 5	342 Fuel Holders, Producers, and Accessories	2.6045%
Ft Saint Vrain Unit 5	343 Prime Movers	3.4456%
Ft Saint Vrain Unit 5	344 Generators	2.8741%
Ft Saint Vrain Unit 5	345 Accessory Electric Equipment	2.7164%
Ft Saint Vrain Unit 5	345.2 Computers and Peripherals	16.6667%
Ft Saint Vrain Unit 5	346 Miscellaneous Power Plant Equipment	3.6472%
Ft Saint Vrain Unit 6	341 Structures and Improvements	2.6988%
Ft Saint Vrain Unit 6	342 Fuel Holders, Producers, and Accessories	2.6045%
Ft Saint Vrain Unit 6	343 Prime Movers	3.4423%
Ft Saint Vrain Unit 6	344 Generators	2.8980%
Ft Saint Vrain Unit 6	345 Accessory Electric Equipment	2.7225%
Ft Saint Vrain Unit 6	345.2 Computers and Peripherals	16.6667%
Ft Saint Vrain Unit 6	346 Miscellaneous Power Plant Equipment	3.6331%
Ft Saint Vrain Common	341 Structures and Improvements	2.9844%
Ft Saint Vrain Common	342 Fuel Holders, Producers, and Accessories	2.7819%
Ft Saint Vrain Common	343 Prime Movers	3.6014%
Ft Saint Vrain Common	344 Generators	2.7819%
Ft Saint Vrain Common	345 Accessory Electric Equipment	3.0718%
Ft Saint Vrain Common	345.2 Computers and Peripherals	16.6667%
Ft Saint Vrain Common	346 Miscellaneous Power Plant Equipment	4.4861%
Ft. Lupton CT	341 Structures and Improvements	3.9413%
Ft. Lupton CT	342 Fuel Holders, Producers, and Accessories	4.1926%
Ft. Lupton CT	343 Prime Movers	4.9390%
Ft. Lupton CT	344 Generators	4.7811%
Ft. Lupton CT	345 Accessory Electric Equipment	8.4510%
Ft. Lupton CT	345.2 Computers and Peripherals	16.6667%
Ft. Lupton CT	346 Miscellaneous Power Plant Equipment	12.2626%
Manchief	341 Structures and Improvements	6.1278%
Manchief	342 Fuel Holders, Producers, and Accessories	6.0644%
Manchief	344 Generators	6.1624%
Manchief	345 Accessory Electric Equipment	6.1534%
Manchief	346 Miscellaneous Power Plant Equipment	6.1889%
Rocky Mountain	341 Structures and Improvements	3.2318%
Rocky Mountain	342 Fuel Holders, Producers, and Accessories	3.1568%
Rocky Mountain	343 Prime Movers	3.6507%
Rocky Mountain	344 Generators	3.0847%
Rocky Mountain	345 Accessory Electric Equipment	3.0294%
Rocky Mountain	345.2 Computers and Peripherals	16.6667%
Rocky Mountain	346 Miscellaneous Power Plant Equipment	4.1346%

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Rush Creek Wind	340 Land Rights	4.0000%
Rush Creek Wind	341 Structures and Improvements	4.1393%
Rush Creek Wind	342 Fuel Holders, Producers, and Accessories	4.1393%
Rush Creek Wind	343 Prime Movers	N/A
Rush Creek Wind	344 Generators	4.1392%
Rush Creek Wind	345 Accessory Electric Equipment	4.3800%
Rush Creek Wind	345.2 Computers and Peripherals	N/A
Rush Creek Wind	346 Miscellaneous Power Plant Equipment	4.1393%
Valmont 6	341 Structures and Improvements	5.0780%
Valmont 6	342 Fuel Holders, Producers, and Accessories	3.3172%
Valmont 6	343 Prime Movers	5.0792%
Valmont 6	344 Generators	5.1139%
Valmont 6	345 Accessory Electric Equipment	5.9443%
Valmont 6	345.2 Computers and Peripherals	16.6667%
Valmont 6	346 Miscellaneous Power Plant Equipment	3.8378%
Valmont 7 & 8	341 Structures and Improvements	6.0880%
Valmont 7 & 8	342 Fuel Holders, Producers, and Accessories	5.9930%
Valmont 7 & 8	343 Prime Movers	6.1165%
Valmont 7 & 8	344 Generators	6.2650%
Valmont 7 & 8	345 Accessory Electric Equipment	6.0152%
Valmont 7 & 8	345.2 Computers and Peripherals	16.6667%
Valmont 7 & 8	346 Miscellaneous Power Plant Equipment	6.3659%
Wind to Hydrogen	344 Generators	5.2320%

TRANSMISSION PLANT

350.2	Land Rights	1.0166%
352	Structures and Improvements	1.8577%
353	Station Equipment	2.1037%
354	Towers and Fixtures	1.5685%
355	Poles and Fixtures	2.6069%
356	Overhead Conductors and Devices	1.7584%
357	Underground Conduit	1.6450%
358	Underground Conductors and Devices	2.1597%
359	Roads and Trails	1.1385%

DISTRIBUTION PLANT

360.2	Land Rights	1.0697%
361	Structures and Improvements	1.7687%
362	Station Equipment	2.1352%
363	Energy Storage Equipment	10.0000%
364	Poles, Towers and Fixtures	2.7999%

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365	Overhead Conductors and Devices	2.6729%
366	Underground Conduit	1.7757%
367	Underground Conductors and Devices	2.1490%
368	Line Transformers	2.2346%
369	Services	2.4253%
369.1	Services-Overhead	2.4828%
369.2	Services-Underground	2.4779%
370	Meters	4.1220%
370.02	Meters – AGIS – AMI Equipment	4.9953%
370.2	Automated Meter Reading Equipment	9.8436%
371	Installation on Customer Premises	4.7217%
371.4	Installation on Customer Premises - EV	10.0000%
373	Street Lighting and Signal Systems	4.4402%

ELECTRIC GENERAL PLANT

389.2	Land Rights	1.6667%
390	Structures and Improvements	2.5043%
391	Office Furniture and Equipment	5.0000%
391.2	Computer Hardware	16.6667%
392.1	Transportation Equipment-Autos	12.8571%
392.2	Transportation Equipment-Light Trucks	12.8571%
392.3	Transportation Equipment-Trailers	5.3333%
392.4	Transportation Equipment-Heavy Trucks	9.0000%
393	Stores Equipment	3.3333%
394	Tools, Shop and Garage Equipment	6.6667%
395	Laboratory Equipment	10.0000%
396	Power Operated Equipment	7.0000%
397	Communication Equipment	6.6667%
398	Miscellaneous Equipment	5.0000%

COMMON INTANGIBLE PLANT

301	Organization Costs		
302	Franchises and Consents		(1)
303	Misc Computer Software-3 Year	33.3333%	
303.04	Misc Computer Software-7 Year	14.2857%	
303.04	Misc Computer Software-10 Year	10.0000%	
303.04	Misc Computer Software-15 Year	6.6667%	

COMMON GENERAL PLANT

389.2	Land Rights	1.6667%	
390	Structures and Improvements	2.4677%	
390.07	Structures and Improvements - Leasehold		(2)

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Improvements			
390.85	Structures and Improvements - 1800 Larimer		(3)
391	Office Furniture and Equipment	5.0000%	
391.04	Computer Hardware	16.6667%	
391.05	Computer Hardware - 3 Year Life	N/A	
392.1	Transportation Equipment - Automobiles	12.8571%	
392.2	Transportation Equipment - Light Trucks	12.8571%	
392.3	Transportation Equipment - Trailers	5.3333%	
392.4	Transportation Equipment - Heavy Trucks	9.0000%	
393	Stores Equipment	3.3333%	
394	Tools and Shop Equipment	6.6667%	
395	Laboratory Equipment	10.0000%	
396	Power Operated Equipment	7.0000%	
397	Communication Equipment	6.6667%	
398	Miscellaneous Equipment	5.0000%	

Notes:

- (1) Amortized over the terms of the franchise agreements or license.
- (2) Amortized over the lease term.
- (3) Amortized to the end of the lease term 6/2025.

Exhibit No. XES - 101

Revised Tables and Workpapers to the Attachment
O-PSCo Transmission Formula Rate Template in
marked eTariff Format

Public Service Company of Colorado
 Transmission Formula Rate Settlement Template
 Twelve Months Ended December 31, 20XX
 Depreciation and Amortization Rates
 Utility Plant, Regulatory Assets, & Regulatory Liabilities

Table 25
 WP_H-1

FERC Account	Name	Depreciation/ Amortization Rate (%)
Electric Plant Acquisition Adjustment- Calpine Acquisition		
114	Transmission Serving Transmission	
	Rocky Mountain Energy Center-Amortization of 55 years ending in 2065.	1.8182%

Unit or Account Number	Account Number and / or Description	Total Depreciation Rate	Notes
ELECTRIC INTANGIBLE PLANT			
301.00	Organization Costs		
302.00	Franchises and Consents		(1)
303.00	Miscellaneous Intangible Plant		(1)
303.40	Misc Computer Software - 3 Year	33.3333%	
303.40	Misc Computer Software - 7 Year	14.2857%	
303.40	Misc Computer Software - 10 Year	10.0000%	
303.40	Misc Computer Software - 15 Year	6.6667%	
STEAM PRODUCTION PLANT			
Cameo Common	310.2 Land Rights	0.0000%	
Cherokee Unit 2 SC	314 Turbogenerator Units	~~6.28825.5878~~ %	
Cherokee Unit 2 SC	315 Accessory Electric Equipment	~~4.20234.9323~~ %	
Cherokee Unit 4	311 Structures and Improvements	~~5.51814.9152~~ %	
Cherokee Unit 4	312 Boiler Plant Equipment	~~5.75285.4682~~ %	
Cherokee Unit 4	312 Boiler Plant Equipment AQIR	~~6.66676.1689~~ %	
Cherokee Unit 4	314 Turbogenerator Units	~~5.31965.5651~~ %	
Cherokee Unit 4	315 Accessory Electric Equipment	~~5.12624.6053~~ %	
Cherokee Unit 4	315.2 Computers and Peripherals	~~6.151511.1111~~ %	
Cherokee Unit 4	316 Miscellaneous Power Plant Equipment	~~8.18358.3495~~ %	
Cherokee Common	310.2 Land Rights	~~4.58634.4992~~ %	
Cherokee Common	310.3 Water Rights	~~5.65055.7036~~ %	
Cherokee Common	311 Structures and Improvements	~~6.44257.5486~~ %	
Cherokee Common	312 Boiler Plant Equipment	~~6.57488.3481~~ %	
Cherokee Common	312 Boiler Plant Equipment AQIR	~~6.66676.3591~~ %	

Cherokee Common	314 Turbogenerator Units	<u>5.28165.5800%</u>
Cherokee Common	315 Accessory Electric Equipment	<u>5.18725.2505%</u>
Cherokee Common	315.2 Computers and Peripherals	<u>5.558711.1111%</u>
Cherokee Common	316 Miscellaneous Power Plant Equipment	<u>7.30206.4923%</u>

Coal Cars	312 Boiler Plant Equipment	<u>4.72854.5597%</u>

Comanche Unit 1	311 Structures and Improvements	<u>2.97343.2460%</u>
Comanche Unit 1	312 Boiler Plant Equipment	<u>3.89824.1647%</u>
Comanche Unit 1	314 Turbogenerator Units	<u>3.46143.9115%</u>
Comanche Unit 1	315 Accessory Electric Equipment	<u>3.07113.6630%</u>
Comanche Unit 1	315.2 Computers and Peripherals	<u>3.446011.1111%</u>
Comanche Unit 1	316 Miscellaneous Power Plant Equipment	<u>2.73695.5684%</u>

Comanche Unit 2	311 Structures and Improvements	<u>2.58433.1168%</u>
Comanche Unit 2	312 Boiler Plant Equipment	<u>3.53903.9115%</u>
Comanche Unit 2	314 Turbogenerator Units	<u>3.01384.1580%</u>
Comanche Unit 2	315 Accessory Electric Equipment	<u>2.85773.9130%</u>
Comanche Unit 2	315.2 Computers and Peripherals	<u>3.369411.1111%</u>
Comanche Unit 2	316 Miscellaneous Power Plant Equipment	<u>2.56494.0784%</u>

Comanche Unit 3	310.2 Land Rights	<u>1.70441.6336%</u>
Comanche Unit 3	311 Structures and Improvements	<u>1.80551.9656%</u>
Comanche Unit 3	312 Boiler Plant Equipment	<u>1.91532.4394%</u>
Comanche Unit 3	314 Turbogenerator Units	<u>1.92622.1352%</u>
Comanche Unit 3	315 Accessory Electric Equipment	<u>1.78291.9390%</u>
Comanche Unit 3	315.2 Computers and Peripherals	<u>1.892611.1111%</u>
Comanche Unit 3	316 Miscellaneous Power Plant Equipment	<u>2.04644.0784%</u>

<u>Comanche Common Retire</u> <u>w/ Unit 1&2</u>	<u>311 Structures and Improvements</u>	<u>5.3599%</u>
<u>Comanche Common Retire</u> <u>w/ Unit 1&2</u>	<u>312 Boiler Plant Equipment</u>	<u>7.3865%</u>
<u>Comanche Common Retire</u> <u>w/ Unit 1&2</u>	<u>314 Turbogenerator Units</u>	<u>7.1471%</u>
<u>Comanche Common Retire</u> <u>w/ Unit 1&2</u>	<u>315 Accessory Electric Equipment</u>	<u>9.1479%</u>
<u>Comanche Common Retire</u> <u>w/ Unit 1&2</u>	<u>315.2 Computers and Peripherals</u>	<u>11.1111%</u>
<u>Comanche Common Retire</u> <u>w/ Unit 1&2</u>	<u>316 Miscellaneous Power Plant Equipment</u>	<u>12.0629%</u>

Comanche Common <u>Retire</u> <u>w/ Unit 3</u>	311 Structures and Improvements	<u>2.02673.3339%</u>
Comanche Common <u>Retire</u> <u>w/ Unit 3</u>	312 Boiler Plant Equipment	<u>2.23133.8530%</u>
Comanche Common <u>Retire</u> <u>w/ Unit 3</u>	314 Turbogenerator Units	<u>2.22493.5119%</u>
Comanche Common <u>Retire</u> <u>w/ Unit 3</u>	315 Accessory Electric Equipment	<u>1.94783.3698%</u>
Comanche Common <u>Retire</u> <u>w/ Unit 3</u>	315.2 Computers and Peripherals	<u>2.186311.1111%</u>
Comanche Common <u>Retire</u> <u>w/ Unit 3</u>	316 Miscellaneous Power Plant Equipment	<u>2.25134.5634%</u>

Craig Unit 1	311 Structures and Improvements	<u>5.17164.6361%</u>
Craig Unit 1	312 Boiler Plant Equipment	<u>4.99964.5596%</u>
Craig Unit 1	314 Turbogenerator Units	<u>10.97819.8769%</u>
Craig Unit 1	315 Accessory Electric Equipment	<u>5.95225.1425%</u>
Craig Unit 1	315.2 Computers and Peripherals	<u>5.524111.1111%</u>
Craig Unit 1	316 Miscellaneous Power Plant Equipment	<u>4.73943.8776%</u>
Craig Unit 2	311 Structures and Improvements	<u>2.39572.3969%</u>
Craig Unit 2	312 Boiler Plant Equipment	<u>2.51464.1690%</u>
Craig Unit 2	314 Turbogenerator Units	<u>3.00403.4852%</u>
Craig Unit 2	315 Accessory Electric Equipment	<u>2.44742.5064%</u>
Craig Unit 2	315.2 Computers and Peripherals	<u>2.585511.1111%</u>
Craig Unit 2	316 Miscellaneous Power Plant Equipment	<u>2.45213.1843%</u>
Craig Common	311 Structures and Improvements	<u>2.70723.0374%</u>
Craig Common	312 Boiler Plant Equipment	<u>3.60043.8261%</u>
Craig Common	314 Turbogenerator Units	<u>3.14933.6220%</u>
Craig Common	315 Accessory Electric Equipment	<u>2.69163.1351%</u>
Craig Common	315.2 Computers and Peripherals	<u>2.914611.1111%</u>
Craig Common	316 Miscellaneous Power Plant Equipment	<u>3.40094.4914%</u>
Hayden Unit 1	311 Structures and Improvements	<u>2.82502.7765%</u>
Hayden Unit 1	312 Boiler Plant Equipment	<u>4.84756.1700%</u>
Hayden Unit 1	314 Turbogenerator Units	<u>3.50094.6638%</u>
Hayden Unit 1	315 Accessory Electric Equipment	<u>3.06723.4811%</u>
Hayden Unit 1	315.2 Computers and Peripherals	<u>6.391411.1111%</u>
Hayden Unit 1	316 Miscellaneous Power Plant Equipment	<u>2.83915.0777%</u>
Hayden Unit 2	311 Structures and Improvements	<u>3.81683.6573%</u>
Hayden Unit 2	312 Boiler Plant Equipment	<u>3.00834.1914%</u>
Hayden Unit 2	314 Turbogenerator Units	<u>2.80873.4567%</u>
Hayden Unit 2	315 Accessory Electric Equipment	<u>2.63792.8917%</u>
Hayden Unit 2	315.2 Computers and Peripherals	<u>4.999311.1111%</u>
Hayden Unit 2	316 Miscellaneous Power Plant Equipment	<u>2.50025.2228%</u>
Hayden Common	311 Structures and Improvements	<u>4.98035.8966%</u>
Hayden Common	312 Boiler Plant Equipment	<u>4.56064.8586%</u>
Hayden Common	314 Turbogenerator Units	<u>5.39675.2379%</u>
Hayden Common	315 Accessory Electric Equipment	<u>4.56935.2611%</u>
Hayden Common	315.2 Computers and Peripherals	<u>4.733611.1111%</u>
Hayden Common	316 Miscellaneous Power Plant Equipment	<u>6.11666.4756%</u>
Pawnee Unit 1	311 Structures and Improvements	<u>2.20502.2067%</u>
Pawnee Unit 1	312 Boiler Plant Equipment	<u>3.03713.7674%</u>
Pawnee Unit 1	314 Turbogenerator Units	<u>2.45853.1836%</u>
Pawnee Unit 1	315 Accessory Electric Equipment	<u>2.20742.4134%</u>
Pawnee Unit 1	315.2 Computers and Peripherals	<u>3.242011.1111%</u>

Pawnee Unit 1	316 Miscellaneous Power Plant Equipment	<u>2.32972.9385%</u>
Pawnee Common	311 Structures and Improvements	<u>6.77549.0795%</u>
Pawnee Common	312 Boiler Plant Equipment	<u>6.96148.1408%</u>
Pawnee Common	314 Turbogenerator Units	<u>6.57777.4947%</u>
Pawnee Common	315 Accessory Electric Equipment	<u>5.96742.9011%</u>
Pawnee Common	315.2 Computers and Peripherals	<u>6.882311.1111%</u>
Pawnee Common	316 Miscellaneous Power Plant Equipment	<u>6.65848.2847%</u>
Zuni Common	310.3 Water Rights	0.0000%
HYDRAULIC PRODUCTION PLANT		
Ames	331 Structures and Improvements	<u>2.37935.1169%</u>
Ames	332 Reservoirs, Dams and Waterways	<u>3.04214.7359%</u>
Ames	333 Waterwheels, Turbines and Generators	<u>2.30555.8801%</u>
Ames	334 Accessory Electric Equipment	<u>2.96795.1027%</u>
Ames	334.2 Computers and Peripherals	<u>3.007411.1111%</u>
Ames	335 Misc. Power Plant Equipment	<u>2.68374.7125%</u>
Ames	335.2 Recreational Facilities	<u>2.82174.6540%</u>
Ames	336 Roads, Railroads and Bridges	<u>2.76124.6657%</u>
Cabin Creek	331 Structures and Improvements	<u>2.72794.8042%</u>
Cabin Creek	332 Reservoirs, Dams and Waterways	<u>2.50225.4031%</u>
Cabin Creek	333 Waterwheels, Turbines and Generators	<u>2.86185.1479%</u>
Cabin Creek	334 Accessory Electric Equipment	<u>2.93715.6077%</u>
Cabin Creek	334.2 Computers and Peripherals	<u>2.803611.1111%</u>
Cabin Creek	335 Misc. Power Plant Equipment	<u>2.68044.8523%</u>
Cabin Creek	335.2 Recreational Facilities	<u>2.91794.5137%</u>
Cabin Creek	336 Roads, Railroads and Bridges	<u>2.40365.3539%</u>
Georgetown	331 Structures and Improvements	<u>4.96065.7437%</u>
Georgetown	332 Reservoirs, Dams and Waterways	<u>5.17697.0424%</u>
Georgetown	333 Waterwheels, Turbines and Generators	<u>4.22628.1383%</u>
Georgetown	334 Accessory Electric Equipment	<u>5.18036.5693%</u>
Georgetown	334.2 Computers and Peripherals	<u>5.161611.1111%</u>
Georgetown	335 Misc. Power Plant Equipment	<u>4.59835.7898%</u>
Georgetown	335.2 Recreational Facilities	<u>5.15245.9691%</u>
Georgetown	336 Roads, Railroads and Bridges	<u>5.16167.0295%</u>
Salida	331 Structures and Improvements	<u>15.579336.4118%</u>
Salida	332 Reservoirs, Dams and Waterways	<u>17.932338.6387%</u>
Salida	333 Waterwheels, Turbines and Generators	<u>14.755036.7841%</u>
Salida	334 Accessory Electric Equipment	<u>15.589336.6599%</u>
Salida	334.2 Computers and Peripherals	<u>17.521511.1111%</u>
Salida	335 Misc. Power Plant Equipment	<u>14.013532.4667%</u>
Salida	335.2 Recreational Facilities	<u>16.803034.6890%</u>

Salida	336 Roads, Railroads and Bridges	<u>15.095636.0175%</u>
Shoshone	331 Structures and Improvements	<u>2.26032.5232%</u>
Shoshone	332 Reservoirs, Dams and Waterways	<u>2.04282.9011%</u>
Shoshone	333 Waterwheels, Turbines and Generators	<u>2.12712.9300%</u>
Shoshone	334 Accessory Electric Equipment	<u>2.36603.0493%</u>
Shoshone	334.2 Computers and Peripherals	<u>2.128511.1111%</u>
Shoshone	335 Misc. Power Plant Equipment	<u>2.17462.5296%</u>
Shoshone	335.2 Recreational Facilities	<u>2.12852.8558%</u>
Shoshone	336 Roads, Railroads and Bridges	<u>1.62133.7741%</u>
Tacoma	331 Structures and Improvements	<u>3.02523.8377%</u>
Tacoma	332 Reservoirs, Dams and Waterways	<u>3.85174.3681%</u>
Tacoma	333 Waterwheels, Turbines and Generators	<u>3.47584.2053%</u>
Tacoma	334 Accessory Electric Equipment	<u>3.70174.6708%</u>
Tacoma	334.2 Computers and Peripherals	<u>3.723311.1111%</u>
Tacoma	335 Misc. Power Plant Equipment	<u>3.17964.1986%</u>
Tacoma	335.2 Recreational Facilities	<u>3.18064.1124%</u>
Tacoma	336 Roads, Railroads and Bridges	<u>2.83304.3052%</u>
OTHER PRODUCTION PLANT		
Alamosa	341 Structures and Improvements	<u>3.83895.3990%</u>
Alamosa	342 Fuel Holders, Producers, and Accessories	<u>1.51812.4185%</u>
Alamosa	343 Prime Movers	<u>2.62804.1047%</u>
Alamosa	344 Generators	<u>1.80923.3262%</u>
Alamosa	345 Accessory Electric Equipment	<u>7.20378.2887%</u>
Alamosa	345.2 Computers and Peripherals	<u>2.628016.6667%</u>
Alamosa	346 Miscellaneous Power Plant Equipment	<u>7.46319.6714%</u>
Blue Spruce	341 Structures and Improvements	<u>2.60312.9417%</u>
Blue Spruce	342 Fuel Holders, Producers, and Accessories	<u>2.60312.9417%</u>
Blue Spruce	343 Prime Movers	<u>2.60312.9417%</u>
Blue Spruce	344 Generators	<u>2.60252.9407%</u>
Blue Spruce	345 Accessory Electric Equipment	<u>2.86043.1596%</u>
Blue Spruce	345.2 Computers and Peripherals	<u>2.603116.6667%</u>
Blue Spruce	346 Miscellaneous Power Plant Equipment	<u>2.60312.9417%</u>
Cherokee 5-7	341 Structures and Improvements	<u>2.53582.7351%</u>
Cherokee 5-7	342 Fuel Holders, Producers, and Accessories	<u>2.75232.6342%</u>
Cherokee 5-7	343 Prime Movers	<u>2.74532.9972%</u>
Cherokee 5-7	344 Generators	<u>2.63072.9351%</u>
Cherokee 5-7	345 Accessory Electric Equipment	<u>2.62002.7593%</u>
Cherokee 5-7	345.2 Computers and Peripherals	<u>2.631216.6667%</u>
Cherokee 5-7	346 Miscellaneous Power Plant Equipment	<u>2.56143.6845%</u>

Cheyenne Ridge Wind	340 Land Rights	4.0000%
Cheyenne Ridge Wind	341 Structures and Improvements	~~4.3400~~ <u>4.1134</u> %
Cheyenne Ridge Wind	342 Fuel Holders, Producers, and Accessories	~~4.3400~~ <u>4.1134</u> %
Cheyenne Ridge Wind	343 Prime Movers	~~4.3400~~ <u>N/A</u> %
Cheyenne Ridge Wind	344 Generators	~~4.3400~~ <u>4.1134</u> %
Cheyenne Ridge Wind	345 Accessory Electric Equipment	~~4.3400~~ <u>4.1134</u> %
Cheyenne Ridge Wind	345.2 Computers and Peripherals	~~4.3400~~ <u>%N/A</u>
Cheyenne Ridge Wind	346 Miscellaneous Power Plant Equipment	~~4.3400~~ <u>4.1134</u> %
Fruita	340 Land Rights	~~1.1052~~ <u>1.8455</u> %
Fruita	341 Structures and Improvements	~~1.5613~~ <u>3.0086</u> %
Fruita	342 Fuel Holders, Producers, and Accessories	~~3.0408~~ <u>5.2835</u> %
Fruita	343 Prime Movers	~~2.3778~~ <u>4.2273</u> %
Fruita	344 Generators	~~1.8005~~ <u>3.5338</u> %
Fruita	345 Accessory Electric Equipment	~~4.2196~~ <u>6.4101</u> %
Fruita	345.2 Computers and Peripherals	~~2.3778~~ <u>16.6667</u> %
Fruita	346 Miscellaneous Power Plant Equipment	~~7.7488~~ <u>9.5135</u> %
Ft Saint Vrain Unit 1	341 Structures and Improvements	~~1.6188~~ <u>2.0582</u> %
Ft Saint Vrain Unit 1	342 Fuel Holders, Producers, and Accessories	~~2.1538~~ <u>2.5676</u> %
Ft Saint Vrain Unit 1	343 Prime Movers	~~3.3481~~ <u>4.7654</u> %
Ft Saint Vrain Unit 1	344 Generators	~~2.2035~~ <u>2.7455</u> %
Ft Saint Vrain Unit 1	345 Accessory Electric Equipment	~~2.0974~~ <u>2.8614</u> %
Ft Saint Vrain Unit 1	345.2 Computers and Peripherals	~~1.8621~~ <u>16.6667</u> %
Ft Saint Vrain Unit 1	346 Miscellaneous Power Plant Equipment	~~1.6657~~ <u>3.5418</u> %
Ft Saint Vrain Unit 2	341 Structures and Improvements	~~3.7307~~ <u>4.3423</u> %
Ft Saint Vrain Unit 2	342 Fuel Holders, Producers, and Accessories	~~2.8630~~ <u>3.8359</u> %
Ft Saint Vrain Unit 2	343 Prime Movers	~~3.7520~~ <u>4.2567</u> %
Ft Saint Vrain Unit 2	344 Generators	~~2.5164~~ <u>3.0897</u> %
Ft Saint Vrain Unit 2	345 Accessory Electric Equipment	~~3.5782~~ <u>3.9665</u> %
Ft Saint Vrain Unit 2	345.2 Computers and Peripherals	~~2.5607~~ <u>16.6667</u> %
Ft Saint Vrain Unit 2	346 Miscellaneous Power Plant Equipment	~~3.3646~~ <u>4.6244</u> %
Ft Saint Vrain Unit 3	341 Structures and Improvements	~~3.4230~~ <u>4.4977</u> %
Ft Saint Vrain Unit 3	342 Fuel Holders, Producers, and Accessories	~~3.7272~~ <u>4.1631</u> %
Ft Saint Vrain Unit 3	343 Prime Movers	~~3.9156~~ <u>4.2551</u> %
Ft Saint Vrain Unit 3	344 Generators	~~3.2332~~ <u>4.5580</u> %
Ft Saint Vrain Unit 3	345 Accessory Electric Equipment	~~3.7374~~ <u>3.9189</u> %
Ft Saint Vrain Unit 3	345.2 Computers and Peripherals	~~3.4230~~ <u>16.6667</u> %
Ft Saint Vrain Unit 3	346 Miscellaneous Power Plant Equipment	~~3.7636~~ <u>5.1528</u> %
Ft Saint Vrain Unit 4	341 Structures and Improvements	~~1.6102~~ <u>2.1351</u> %
Ft Saint Vrain Unit 4	342 Fuel Holders, Producers, and Accessories	~~2.5550~~ <u>2.6789</u> %
Ft Saint Vrain Unit 4	343 Prime Movers	~~3.8916~~ <u>4.7941</u> %
Ft Saint Vrain Unit 4	344 Generators	~~2.5798~~ <u>3.5192</u> %
Ft Saint Vrain Unit 4	345 Accessory Electric Equipment	~~2.5161~~ <u>2.9161</u> %
Ft Saint Vrain Unit 4	345.2 Computers and Peripherals	~~2.5511~~ <u>16.6667</u> %

Ft Saint Vrain Unit 4	346 Miscellaneous Power Plant Equipment	~~2.47093~~ <u>2.6558</u> %
Ft Saint Vrain Unit 5	341 Structures and Improvements	~~2.47742~~ <u>2.6993</u> %
Ft Saint Vrain Unit 5	342 Fuel Holders, Producers, and Accessories	~~2.62382~~ <u>2.6045</u> %
Ft Saint Vrain Unit 5	343 Prime Movers	~~3.15673~~ <u>3.4456</u> %
Ft Saint Vrain Unit 5	344 Generators	~~2.54312~~ <u>2.8741</u> %
Ft Saint Vrain Unit 5	345 Accessory Electric Equipment	~~2.53652~~ <u>2.7164</u> %
Ft Saint Vrain Unit 5	345.2 Computers and Peripherals	~~2.54681~~ <u>2.6667</u> %
Ft Saint Vrain Unit 5	346 Miscellaneous Power Plant Equipment	~~2.54013~~ <u>2.6472</u> %
Ft Saint Vrain Unit 6	341 Structures and Improvements	~~2.47822~~ <u>2.6988</u> %
Ft Saint Vrain Unit 6	342 Fuel Holders, Producers, and Accessories	~~2.62462~~ <u>2.6045</u> %
Ft Saint Vrain Unit 6	343 Prime Movers	~~3.15783~~ <u>3.4423</u> %
Ft Saint Vrain Unit 6	344 Generators	~~2.54402~~ <u>2.8980</u> %
Ft Saint Vrain Unit 6	345 Accessory Electric Equipment	~~2.53762~~ <u>2.7225</u> %
Ft Saint Vrain Unit 6	345.2 Computers and Peripherals	~~2.54831~~ <u>2.6667</u> %
Ft Saint Vrain Unit 6	346 Miscellaneous Power Plant Equipment	~~2.49603~~ <u>2.6331</u> %
Ft Saint Vrain Common	341 Structures and Improvements	~~2.08452~~ <u>2.9844</u> %
Ft Saint Vrain Common	342 Fuel Holders, Producers, and Accessories	~~2.32402~~ <u>2.7819</u> %
Ft Saint Vrain Common	343 Prime Movers	~~3.17353~~ <u>3.6014</u> %
Ft Saint Vrain Common	344 Generators	~~2.31052~~ <u>2.7819</u> %
Ft Saint Vrain Common	345 Accessory Electric Equipment	~~2.32403~~ <u>2.0718</u> %
Ft Saint Vrain Common	345.2 Computers and Peripherals	~~3.24621~~ <u>2.6667</u> %
Ft Saint Vrain Common	346 Miscellaneous Power Plant Equipment	~~3.09454~~ <u>2.4861</u> %
Ft. Lupton CT	341 Structures and Improvements	~~2.36273~~ <u>2.9413</u> %
Ft. Lupton CT	342 Fuel Holders, Producers, and Accessories	~~2.80584~~ <u>2.1926</u> %
Ft. Lupton CT	343 Prime Movers	~~3.20854~~ <u>2.9390</u> %
Ft. Lupton CT	344 Generators	~~3.08464~~ <u>2.7811</u> %
Ft. Lupton CT	345 Accessory Electric Equipment	~~6.12158~~ <u>2.4510</u> %
Ft. Lupton CT	345.2 Computers and Peripherals	~~3.20851~~ <u>2.6667</u> %
Ft. Lupton CT	346 Miscellaneous Power Plant Equipment	~~1.48031~~ <u>2.2626</u> %
<u>Manchief</u>	<u>341 Structures and Improvements</u>	<u>6.1278</u> %
<u>Manchief</u>	<u>342 Fuel Holders, Producers, and Accessories</u>	<u>6.0644</u> %
<u>Manchief</u>	<u>344 Generators</u>	<u>6.1624</u> %
<u>Manchief</u>	<u>345 Accessory Electric Equipment</u>	<u>6.1534</u> %
<u>Manchief</u>	<u>346 Miscellaneous Power Plant Equipment</u>	<u>6.1889</u> %
Rocky Mountain	341 Structures and Improvements	~~2.70603~~ <u>2.2318</u> %
Rocky Mountain	342 Fuel Holders, Producers, and Accessories	~~3.13913~~ <u>2.1568</u> %
Rocky Mountain	343 Prime Movers	~~3.13153~~ <u>2.6507</u> %
Rocky Mountain	344 Generators	~~2.65223~~ <u>2.0847</u> %
Rocky Mountain	345 Accessory Electric Equipment	~~2.75673~~ <u>2.0294</u> %
Rocky Mountain	345.2 Computers and Peripherals	~~2.65871~~ <u>2.6667</u> %
Rocky Mountain	346 Miscellaneous Power Plant Equipment	~~2.65264~~ <u>2.1346</u> %

Rush Creek Wind	340 Land Rights	4.0000%
Rush Creek Wind	341 Structures and Improvements	~~4.3400~~ <u>4.1393</u> %
Rush Creek Wind	342 Fuel Holders, Producers, and Accessories	~~4.3400~~ <u>4.1393</u> %
Rush Creek Wind	343 Prime Movers	~~4.3400~~ <u>%N/A</u>
Rush Creek Wind	344 Generators	~~4.3400~~ <u>4.1392</u> %
Rush Creek Wind	345 Accessory Electric Equipment	~~4.3400~~ <u>4.3800</u> %
Rush Creek Wind	345.2 Computers and Peripherals	~~4.3400~~ <u>%N/A</u>
Rush Creek Wind	346 Miscellaneous Power Plant Equipment	~~4.3400~~ <u>4.1393</u> %

Valmont <u>6</u>	341 Structures and Improvements	~~1.4055~~ <u>5.0780</u> %
Valmont <u>6</u>	342 Fuel Holders, Producers, and Accessories	~~1.7488~~ <u>3.3172</u> %
Valmont <u>6</u>	343 Prime Movers	~~2.3349~~ <u>5.0792</u> %
Valmont <u>6</u>	344 Generators	~~2.2941~~ <u>5.1139</u> %
Valmont <u>6</u>	345 Accessory Electric Equipment	~~3.1096~~ <u>5.9443</u> %
Valmont <u>6</u>	345.2 Computers and Peripherals	~~2.3349~~ <u>16.6667</u> %
Valmont <u>6</u>	346 Miscellaneous Power Plant Equipment	~~3.0965~~ <u>3.8378</u> %

<u>Valmont 7 & 8</u>	<u>341 Structures and Improvements</u>	<u>6.0880</u> %
<u>Valmont 7 & 8</u>	<u>342 Fuel Holders, Producers, and Accessories</u>	<u>5.9930</u> %
<u>Valmont 7 & 8</u>	<u>343 Prime Movers</u>	<u>6.1165</u> %
<u>Valmont 7 & 8</u>	<u>344 Generators</u>	<u>6.2650</u> %
<u>Valmont 7 & 8</u>	<u>345 Accessory Electric Equipment</u>	<u>6.0152</u> %
<u>Valmont 7 & 8</u>	<u>345.2 Computers and Peripherals</u>	<u>16.6667</u> %
<u>Valmont 7 & 8</u>	<u>346 Miscellaneous Power Plant Equipment</u>	<u>6.3659</u> %

Wind to Hydrogen	344 Generators	5.2320%

TRANSMISSION PLANT

350.2	Land Rights	~~0.9980~~ <u>1.0166</u> %
352	Structures and Improvements	~~1.1916~~ <u>1.8577</u> %
353	Station Equipment	~~1.9792~~ <u>2.1037</u> %
354	Towers and Fixtures	~~1.4750~~ <u>1.5685</u> %
355	Poles and Fixtures	~~2.2547~~ <u>2.6069</u> %
356	Overhead Conductors and Devices	~~1.7817~~ <u>1.7584</u> %
357	Underground Conduit	~~1.6627~~ <u>1.6450</u> %
358	Underground Conductors and Devices	~~1.9945~~ <u>2.1597</u> %
359	Roads and Trails	~~1.0825~~ <u>1.1385</u> %

DISTRIBUTION PLANT

360.2	Land Rights	~~0.9898~~ <u>1.0697</u> %
361	Structures and Improvements	~~1.5834~~ <u>1.7687</u> %
362	Station Equipment	~~1.8919~~ <u>2.1352</u> %
<u>363</u>	<u>Energy Storage Equipment</u>	<u>10.0000</u> %
364	Poles, Towers and Fixtures	~~2.7020~~ <u>2.7999</u> %

365	Overhead Conductors and Devices	~~2.7400~~ 2.6729%
366	Underground Conduit	~~1.7497~~ 1.7757%
367	Underground Conductors and Devices	~~2.1815~~ 2.1490%
368	Line Transformers	~~2.2600~~ 2.2346%
369	Services	~~2.1540~~ 2.4253%
369.1	Services-Overhead	~~2.4347~~ 2.4828%
369.2	Services-Underground	~~2.4311~~ 2.4779%
370	Meters	~~3.8122~~ 4.1220%
<u>370.02</u>	<u>Meters – AGIS – AMI Equipment</u>	<u>4.9953%</u>
370.2	Automated Meter Reading Equipment	~~7.5908~~ 9.8436%
371	Installation on Customer Premises	~~4.4155~~ 4.7217%
<u>371.4</u>	<u>Installation on Customer Premises - EV</u>	<u>10.0000%</u>
373	Street Lighting and Signal Systems	~~2.9492~~ 4.4402%

ELECTRIC GENERAL PLANT

389.2	Land Rights	1.6667%
390	Structures and Improvements	~~2.2521~~ 2.5043%
391	Office Furniture and Equipment	~~4.5583~~ 5.0000%
391.2	Computer Hardware	~~16.2260~~ 16.6667%
392.1	Transportation Equipment-Autos	~~7.1923~~ 12.8571%
392.2	Transportation Equipment-Light Trucks	~~7.0136~~ 12.8571%
392.3	Transportation Equipment-Trailers	~~3.1247~~ 5.3333%
392.4	Transportation Equipment-Heavy Trucks	~~5.8937~~ 9.0000%
393	Stores Equipment	~~3.1640~~ 3.3333%
394	Tools, Shop and Garage Equipment	~~3.8445~~ 6.6667%
395	Laboratory Equipment	10.0000%
396	Power Operated Equipment	~~5.6340~~ 7.0000%
397	Communication Equipment	~~6.3007~~ 6.6667%
398	Miscellaneous Equipment	~~4.5977~~ 5.0000%

COMMON INTANGIBLE PLANT ~~(4)~~

301	Organization Costs		
302	Franchises and Consents		(1)
303	Misc Computer Software-3 Year	33.3333%	
303.04	Misc Computer Software-7 Year	14.2857%	
303.04	Misc Computer Software-10 Year	10.0000%	
303.04	Misc Computer Software-15 Year	6.6667%	

COMMON GENERAL PLANT ~~(4)~~

389.2	Land Rights	1.6667%	
390	Structures and Improvements	~~2.4191~~ 2.4677%	
390.07	Structures and Improvements - Leasehold		(2)

Improvements

390.85	Structures and Improvements - 1800 Larimer	(3)
391	Office Furniture and Equipment	~~4.9019~~ <u>5.0000</u> %
391.04	Computer Hardware	~~16.3559~~ <u>16.6667</u> %
391.05	Computer Hardware - 3 Year Life	~~32.6080~~ <u>N/A</u>
392.1	Transportation Equipment - Automobiles	~~7.4233~~ <u>12.8571</u> %
392.2	Transportation Equipment - Light Trucks	~~7.3603~~ <u>12.8571</u> %
392.3	Transportation Equipment - Trailers	~~3.1677~~ <u>5.3333</u> %
392.4	Transportation Equipment - Heavy Trucks	~~6.1716~~ <u>9.0000</u> %
393	Stores Equipment	~~3.1640~~ <u>3.3333</u> %
394	Tools and Shop Equipment	~~3.9186~~ <u>6.6667</u> %
395	Laboratory Equipment	~~9.9572~~ <u>10.0000</u> %
396	Power Operated Equipment	~~5.8982~~ <u>7.0000</u> %
397	Communication Equipment	~~5.4453~~ <u>6.6667</u> %
398	Miscellaneous Equipment	~~4.6394~~ <u>5.0000</u> %

Notes:

- (1) Amortized over the terms of the franchise agreements or license.
- (2) Amortized over the lease term.
- (3) Amortized to the end of the lease term 6/2025.
- ~~(4) The revised Common Utility Plant depreciation rates accepted in Docket ER19-2077 will be reflected effective January 1, 2018 (with the 2018 True-up).~~

Exhibit No. XES - 200

Direct Testimony of Ms. Laurie J. Wold of XES

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Public Service Company of Colorado

)
)

Docket No. ER22-____-000

**DIRECT TESTIMONY
OF
LAURIE J. WOLD**

**ON BEHALF OF
PUBLIC SERVICE COMPANY OF COLORADO**

March 31, 2022

DIRECT TESTIMONY OF LAURIE J. WOLD

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**EXHIBITS TO
DIRECT TESTIMONY OF LAURIE J. WOLD**

<u>Exhibit No.</u>	<u>Description</u>
XES – 201	Public Service Company of Colorado – Electric and Common Utility Plant Depreciation Rate Study at December 31, 2020, conducted by Alliance Consulting Group, CoPUC Proceeding No. 21AL-0317E;
XES – 202	Unopposed and Comprehensive Settlement Agreement (Except as to One Issue), CoPUC Proceeding No. 21AL-0317E
XES – 203	CoPUC Decision Approving Settlement, Proceeding No. 21AL-0317E

)
)

Ms. Wold’s Direct Testimony on behalf of Public Service Company of Colorado (“PSCo” or the “Company”) supports the changes PSCo is making to Utility Plant depreciation rates to be used in PSCo’s Transmission Formula Rate Template, Attachment O-PSCo (“Transmission Formula Rate” or “Template”) to the Xcel Energy Operating Companies Open Access Transmission Tariff (“Tariff”). Ms. Wold explains that the proposed changes to the transmission and general plant depreciation rates are supported by a Unanimous Comprehensive Settlement Agreement (“Settlement Agreement”) approved by the Colorado Public Utilities Commission (“Colorado PUC” or “CoPUC”) in CoPUC Proceeding No. 21AL-0317E. Ms. Wold explains that Alliance Consulting Group (“Alliance”) prepared a “Public Service Company of Colorado – Electric and Common Utility Plant Depreciation Rate Study at December 31, 2020” (“Depreciation Rate Study”) filed in Proceeding No. 21AL-0317E. The Settlement Agreement resulted in the CoPUC’s acceptance of the Company’s recommended transmission and general depreciation rates which increase the Company’s transmission depreciation expense as supported by the Depreciation Rate Study. The Settlement Agreement was approved by the CoPUC as just and reasonable and in the public interest. A copy of the Depreciation Rate Study, the Settlement Agreement, settled depreciation rates and other supporting documents are provided as exhibits to Ms. Wold’s testimony.

The Settlement Agreement provided that PSCo would implement the new depreciation rates in retail rates effective upon order of Proceeding 21AL-0317E, and the revised retail depreciation transmission and general rates are expected to be effective for retail ratemaking in April 2022.

Ms. Wold explains that PSCo has, for many years, used the same depreciation rates and practices for both retail electric service and for wholesale transmission services under the Tariff. Ms. Wold recommends that the Federal Energy Regulatory Commission (“FERC” or “Commission”) approve the Company’s revised transmission and general plant depreciation rates included in the Settlement Agreement for regulatory and financial accounting purposes effective the same date the depreciation rates are effective for regulatory and financial accounting purposes in Colorado. Ms. Wold also recommends the Commission accept the proposed revisions to Table 25 to Attachment O-PSCo to reflect the Settlement Agreement depreciation rates effective the same date.

DIRECT TESTIMONY OF

LAURIE J. WOLD

I. INTRODUCTION AND EXPERIENCE

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Laurie J. Wold. My business address is 414 Nicollet Mall, 401 – 3, Minneapolis, Minnesota 55401.

Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

A. I am employed by Xcel Energy Services Inc. (“Xcel Energy Services” or “XES”), a wholly-owned subsidiary of Xcel Energy Inc. (“Xcel Energy”), as Senior Manager, Capital Asset Accounting. Xcel Energy Services is the centralized service company for the Xcel Energy holding company system, and provides services to the subsidiaries of Xcel Energy.

Q. PLEASE DESCRIBE XCEL ENERGY.

A. Xcel Energy is a public utility holding company with, among other subsidiaries, four wholly-owned, vertically integrated public utility operating company subsidiaries: Public Service Company of Colorado (“PSCo” or the “Company”), Northern States Power Company, a Minnesota corporation (“NSPM”), Northern States Power Company, a Wisconsin corporation (“NSPW”), and Southwestern Public Service Company (“SPS”) (together, the “Xcel Energy Operating Companies”).

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of PSCo.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

1 A. Since April of 2017, I have been employed as a Senior Manager in Xcel Energy Services'
2 Capital Asset Accounting department. Prior to this role, I was a Manager in the
3 Transmission Finance department. I have been employed at Xcel Energy Services since
4 October of 2011. I graduated from Metropolitan State University in Minneapolis,
5 Minnesota, with a Bachelor of Science degree in Accounting in 2011. Prior to obtaining
6 this degree, I was an Accounting Supervisor at USA Today from 2006 until 2010.
7 Additionally, I have worked in several financial roles in multiple industries since 1997.

8 **Q. WHAT ARE YOUR DUTIES IN YOUR CURRENT POSITION?**

9 A. I manage a Capital Asset Accounting department and am responsible for various duties
10 relating to accounting, reporting, and rate proposals involving depreciation for PSCo and
11 other Xcel Energy Operating Companies.

12 **Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE**
13 **FEDERAL ENERGY REGULATORY COMMISSION?**

14 A. Yes, I have submitted testimony to the Commission in Docket No. ER20-277-000, as
15 well as to a number of state commissions as outlined in my current position's
16 responsibilities above.

17 **Q. WAS THIS TESTIMONY PREPARED BY YOU OR UNDER YOUR DIRECT**
18 **SUPERVISION?**

19 A. Yes, the testimony and exhibits were prepared by me or under my direct supervision.
20

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

A. The purpose of my testimony is to support PSCo's changes to the depreciation rates listed in Table 25 to the Transmission Formula Rate template ("Transmission Formula Rate" or "Template") included in Attachment O-PSCo to the Xcel Energy Operating Companies Open Access Transmission Tariff ("OATT" or "Tariff"). The updated depreciation rates will apply to the depreciation expense calculation used in the Transmission Formula Rate effective when those same changes are reflected in PSCo retail electric rates in Colorado, on April 1, 2022. PSCo uses the Template to calculate an Annual Transmission Revenue Requirement ("ATRR") applicable to the PSCo transmission system to determine PSCo's wholesale transmission service rates under the Tariff. I am providing the accounting support and justification for the Company's adoption of the proposed depreciation rates for (1) Production Plant, (2) Transmission Plant, (3) Electric General Plant, and (4) Common General Plant, including Intangible Plant, such as software.¹ As the Company's accounting witness, I am attesting to the reasonableness of the Company's proposals in this proceeding and their consistency with sound depreciation practices. My testimony will cover the following:

- I introduce and summarize the "Public Service Company of Colorado – Electric and Common Utility Plant Depreciation Rate Study at December 31, 2020"

¹ For ease of reference, the term "depreciation rates" or "Utility Plant" is used in this proceeding to refer to the Company's depreciation and amortization of all utility plant accounts. It should be noted, however, that certain of the Company's intangible plant accounts are amortized, and not depreciated through the use of approved depreciation rates. Thus, in many contexts, the term "depreciation rates" also includes the amortization periods applicable to accounts that are amortized, and not depreciated.

1 (“Depreciation Rate Study”) which supports and justifies the proposed
2 depreciation rates.

- 3 • I introduce and discuss the Unanimous Comprehensive Settlement Agreement
4 (“Settlement Agreement”) approved by the Colorado Public Utilities Commission
5 (“Colorado PUC” or “CoPUC”) as just and reasonable and in the public interest in
6 CoPUC Proceeding No. 21AL-0317E, which accepted the depreciation rates
7 proposed and supported by the Depreciation Rate Study.
- 8 • I sponsor and summarize the proposed depreciation rates for Transmission and
9 General Plant accounts being proposed by the Company for approval in this case
10 and for inclusion in Table 25 to the Attachment O-PSCo Template.

11 **Q. WHO PERFORMED THE DEPRECIATION RATE STUDY?**

12 A. The Depreciation Rate Study was performed by Alliance Consulting Group (“Alliance”)
13 at PSCo’s direction and supervision. Alliance personnel have over 80 years of combined
14 experience in conducting depreciation studies, as well as many years of utility experience
15 managing and studying utility assets.

16 **Q. PLEASE DESCRIBE THE ADMINISTRATIVE REVIEW PROCESS**
17 **CONDUCTED BY THE COLORADO PUC.**

18 A. The CoPUC set the PSCo filing in Proceeding 21AL-0317E for an administrative hearing
19 process. PSCo and several intervenor parties, including the CoPUC staff, filed testimony.
20 The parties reached an Unopposed and Comprehensive Settlement Agreement
21 (“Settlement Agreement”) before the evidentiary hearing was held. The CoPUC
22 proceeded to have a Settlement Hearing on January 18, 2022.

1 **Q. PLEASE DESCRIBE THE SETTLEMENT AGREEMENT SUBMITTED TO THE**
2 **COLORADO PUC BY PSCO.**

3 A. While some issues were subject to settlement negotiations, depreciation rates
4 recommended in the Depreciation Rate Study were accepted as filed, and the Settlement
5 Agreement, dated January 5, 2022, was submitted to the CoPUC for approval. Exhibit
6 No. XES – 202 to my testimony is a copy of the Settlement Agreement. The CoPUC
7 verbally addressed and approved the Settlement Agreement in a public hearing on March
8 16, 2022. The decision order approving the Settlement Agreement, which is Exhibit No.
9 XES – 203 to my testimony, has a mailing date of March 24, 2022.

10 The CoPUC Decision Order provides that the depreciation rates established in
11 Proceeding No. 21AL-0317E are effective for retail ratemaking purposes on April 1,
12 2022.

13 **Q. WHAT STANDARD OF REVIEW IS USED FOR THE COLORADO PUC TO**
14 **APPROVE DEPRECIATION RATES?**

15 A. The Colorado PUC reviewed and approved PSCo's proposed depreciation rates under a
16 public interest as well as a just and reasonable standard per Section 40-3-101, C.R.S.²

17 Although, as I understand it, the Commission must conduct its own, independent
18 review of the depreciation rates, the depreciation rates in the Settlement Agreement
19 should also meet the "just and reasonable" standard used by the Commission under the
20 Federal Power Act.

² Section 13-25-127(1), C.R.S., and Rule 4 *Code of Colorado Regulations* 723-1-1500 of the

Commission's Rules of Practice and Procedure, establish the burden of proof for a party which asks the Commission to adopt its advocated position. Decision No. C06-0786 issued July 3, 2006 in Proceeding No. 05A-072E, at ¶ 40 & n.23.

**Q. WHY IS PSCO FILING THE PROPOSED DEPRECIATION RATE CHANGES
IN TABLE 25?**

A. PSCo has for many years used the same depreciation rates and practices for both retail electric service and for wholesale transmission services. Using the same depreciation rates for both wholesale and retail services significantly simplifies the Company's depreciation accounting. Indeed, the settlement agreement in Docket Nos. ER12-1589-000, et al., which established the Transmission Formula Rate, provided that "Currently the depreciation rates for PSCo's retail and FERC jurisdictions are the same. PSCo will actively pursue any filings necessary to keep such rates synchronized."³ Since PSCo's retail depreciation rates will be changing on April 1, 2022, PSCo is now filing the depreciation rates approved by the CoPUC with the Commission to be effective coincident with the expected effective date of the Company's new Colorado retail electric rates.

In addition, the revised depreciation rates reflect more recent information and analysis. The depreciation rates presently used in Table 25 were last updated with the Commission in Docket No. ER20-251-000. The depreciation rates submitted in the filing in Docket No. ER20-251-000 were initially developed pursuant to a depreciation study performed in 2015 using account balances as of September 30, 2015, which were filed with the CoPUC in 2016 and modified pursuant to a settlement agreement in the CoPUC proceeding. However, due to delays in implementing the revised depreciation rates at the retail level, PSCo did not seek to incorporate the revised depreciation rates into Commission-jurisdictional transmission rates until the fourth quarter of 2019, in Docket

³ Stipulation and Offer of Partial Settlement at § D.2, Docket No. ER12-1589-000, et al. (Oct. 7, 2013).

No. ER20-251-000. In the new Depreciation Rate Study by Alliance, discussed in my testimony below, more recent information is used and the study is based on account balances as of December 31, 2020. The revised depreciation rates proposed by PSCo in this proceeding thus are more reflective of PSCo's actual depreciation costs. As I note later in my testimony, it is important to use the most recent information in setting depreciation rates to ensure an asset's cost is fully recovered ratably from all customers by the time it is retired.

Q. HAVE YOU PREPARED ANY EXHIBITS IN SUPPORT OF YOUR TESTIMONY IN THIS PROCEEDING?

A. Yes. I am sponsoring the following exhibits:

- Exhibit No. XES – 201, the 2021 Electric and General Plant Depreciation Rate Study performed by Alliance Consulting Group.
- Exhibit No. XES – 202, the Settlement Agreement from Colorado PUC Proceeding No. 21AL-0317E, dated December 30, 2021.
- Exhibit No. XES – 203, the Decision Order in Colorado PUC Proceeding No. 21AL-0317E, C22-0178 of the Public Utilities Commission of the State of Colorado, dated March 16, 2022, to accept the Settlement Agreement.

III. THE ALLIANCE DEPRECIATION RATE STUDY

A. INTRODUCTION TO THE DEPRECIATION RATE STUDY

Q. WHAT DEFINITION OF DEPRECIATION IS USED FOR THE PURPOSES OF CONDUCTING THE DEPRECIATION STUDY AND PREPARING YOUR DIRECT TESTIMONY?

1 A. The term “depreciation,” as used herein, is considered in the accounting sense – that is, a
2 system of accounting that distributes the cost of assets, less net salvage (if any), over the
3 estimated useful life of the assets in a systematic and rational manner. Depreciation is a
4 process of allocation, not valuation. In other words, depreciation expense allocates the
5 cost of the asset, including any estimated net salvage necessary to remove the asset, as an
6 ongoing cost of operations over the economic life of the asset. However, the amount
7 allocated to any single accounting period does not necessarily represent an actual loss or
8 decrease in value that will occur during that particular period. The Company accrues
9 depreciation on the basis of the original cost of all depreciable property included in each
10 functional property group. On retirement, the full cost of depreciable property, less the
11 net salvage value, is charged to the depreciation reserve.

12 **Q. WHY SHOULD DEPRECIATION RATES BE UPDATED PERIODICALLY?**

13 A. Depreciation is an estimation of future expectations. Using those estimations, the cost of
14 the asset is spread ratably to customers over that period. If the estimation of the useful
15 period changes as the asset is used, the depreciation estimate should be realigned to those
16 new estimates so that the asset’s cost is fully recovered by the time it is retired. When
17 depreciation rates are set at a level that does not reflect the actual life and retirement
18 characteristics of a utility’s assets, the cost of the asset will not be recovered ratably from
19 the customers using that asset.

20 **Q. WHAT ARE THE DEPRECIATION RATES PSCO IS PROPOSING?**

21 A. The Depreciation Rate Study supports changes to the depreciation rates for PSCO’s
22 transmission and supporting assets. The Settlement Agreement did not change the rates

1 identified in the Depreciation Rate Study, and these same rates were approved as in the
2 public interest by the CoPUC in Decision No. C22-0178.

3 **Q. PLEASE GENERALLY DESCRIBE THE PURPOSE OF THE DEPRECIATION**
4 **STUDY.**

5 A. The key functions of the Depreciation Study are to: (1) determine the average service
6 lives for Transmission, Distribution, Electric General and Common General Plant;
7 (2) determine the net salvage amounts for all Production Plant, which are supported by
8 the Decommissioning Study; (3) determine the net salvage percentages for Transmission,
9 Distribution, Electric General and Common General Plant; (4) calculate the theoretical
10 reserve of each property group based on the remaining life of the group, the total life of
11 the group and the estimated net salvage; (5) conduct a depreciation reserve reallocation;
12 and (6) develop depreciation rates, including the annual depreciation accrual.

13 **Q. BASED ON THE DEPRECIATION STUDY, WHAT CONCLUSIONS DO YOU**
14 **REACH?**

15 A. I conclude that the depreciation rates developed for the Company's Utility Plant accounts
16 as set forth in the Depreciation Study encompass the best and most recent information for
17 calculating PSCo's depreciation and amortization expense associated with these assets.

18 Based on life and net salvage parameters developed for actual plant asset balances
19 and depreciation reserves as of December 31, 2020, the depreciation rates in the
20 Depreciation Study will result in an increase in the annual depreciation expense for PSCo's
21 electric utility assets of approximately \$49.7 million per year. The amount is determined
22 by comparing the depreciation expense based on the current depreciation rates to the
23 depreciation expense based on the proposed depreciation rates as of December 31, 2020.

1 This comparison is shown in detail in Appendix B of Exhibit No. XES – 202 and is
2 summarized in Table LJW-D-3, which is presented later in my Direct Testimony.

3 **B. DISCUSSION OF THE DEPRECIATION STUDY**

4 **Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR DIRECT**
5 **TESTIMONY?**

6 A In this section of my Direct Testimony, I testify to the property included or excluded
7 from the Depreciation Study; the four-phase approach used to conduct the Depreciation
8 Study; and the depreciation system (straight-line method, ALG procedure, remaining-life
9 technique) used for the Depreciation Study.

10 **Q. WHAT PROPERTY IS INCLUDED IN OR EXCLUDED FROM THE**
11 **DEPRECIATION STUDY?**

12 A. There are five general classes, or functional groups, of depreciable property that are
13 analyzed in the Depreciation Study: (1) Production Plant, (2) Transmission Plant,
14 (3) Distribution Plant, (4) Electric General Plant, and (5) Common General Plant
15 property.⁴ Under Production Plant, there are three different functions of property:
16 Steam, Hydraulic (Hydro) and Other. Steam generation in accounts 310-316 consists of
17 generating units that use fossil fuels. Hydraulic assets in accounts 330-336 consist of
18 generating facilities located at dams. Other Production assets in accounts 340-346
19 consist of generating units (such as combustion turbines) that use natural gas to produce
20 electricity. Other Production Wind assets consist of Wind Farms that went into service in
21 2018 and 2020. The Transmission Plant functional group primarily consists of lines and
22 associated facilities used to move power from power plants and outside areas into the

⁴ Collectively termed “Utility Plant”.

1 distribution system. The Distribution Plant functional group primarily consists of lines
2 and associated facilities used to distribute electricity to customers of PSCo. Electric
3 General Plant and Common General Plant property is not location specific, but is plant
4 used to support the Company's overall operations, such as office buildings and software.

5 **Q. ARE THERE OTHER ASSETS THAT WERE ANALYZED IN THE**
6 **DEPRECIATION STUDY?**

7 A. Yes. The Company is adding generation assets that will come on-line in 2021 and 2022.
8 Valmont 9 & 10 went in-service in 2021. The Company is also acquiring the Manchief
9 plant in 2022 from Southwest Generation Operating Company, LLC. The recommended
10 rates for those facilities are shown in the Depreciation Study in Appendix A-3.

11 **Q. PLEASE DESCRIBE THE DEPRECIATION STUDY APPROACH.**

12 A. The Depreciation Study was conducted in four phases, as described at pages 16-18 of
13 Exhibit No. XES-202. The four phases are: Data Collection, Analysis, Evaluation, and
14 Calculation. During the initial phase of the Depreciation Study, historical data through
15 December 31, 2020 was collected to be used in the analysis. After the data was
16 assembled, Alliance performed analyses to determine the lives and net salvage
17 percentages for the different property groups being studied. As part of this process,
18 Alliance conferred with field personnel, engineers, and managers responsible for the
19 installation, operation, and removal of the assets to gain their input into the operation,
20 maintenance, and salvage of the assets. Alliance then evaluated the information obtained
21 from field personnel, engineers and managerial personnel, combined with the
22 Depreciation Study results, to determine how the results of the historical asset activity
23 analysis, in conjunction with the Company's expected future plans, should be applied. In

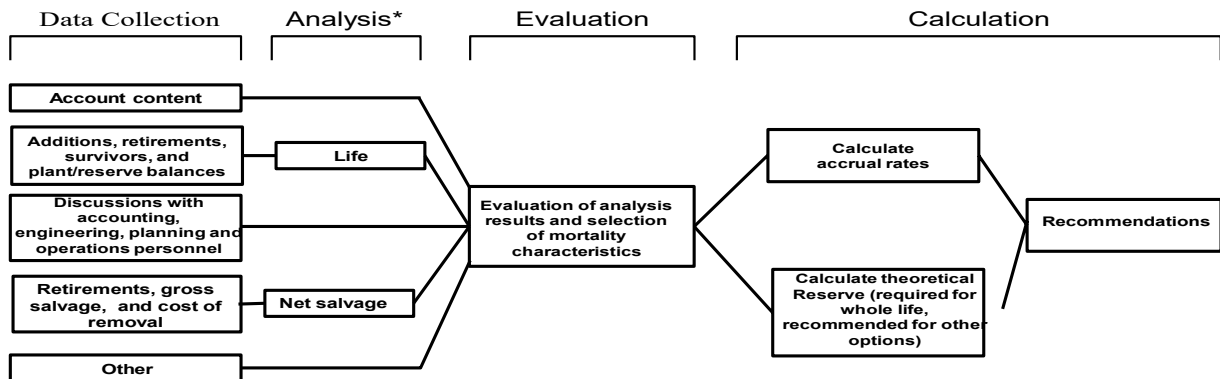
the final phase, Alliance calculated depreciation rates and the theoretical reserve as a component of the reserve reallocation.

The authoritative treatise, DEPRECIATION SYSTEMS, documents the following stages of a depreciation study: statistical analysis, evaluation of statistical analysis, discussions with management, forecast assumptions, and document recommendations.⁵

Alliance's approach mirrors this process, and following this approach ensures that Alliance comprehensively and thoroughly projects the future expectations for the Company's assets.

Figure LJW-D-1 demonstrates the four phases of the Depreciation Study.

FIGURE LJW-D-1
Stages to Develop a Depreciation Study



Source: Introduction to Depreciation for Public Utilities and Other Industries, AGA EEI, 2013.

*Although not specifically noted, the mathematical analysis may need some level of input from other sources (for example, to determine analysis bands for life and adjustments to data used in all analysis).

Q. WHAT DEPRECIATION METHOD WAS USED FOR THE DEPRECIATION STUDY?

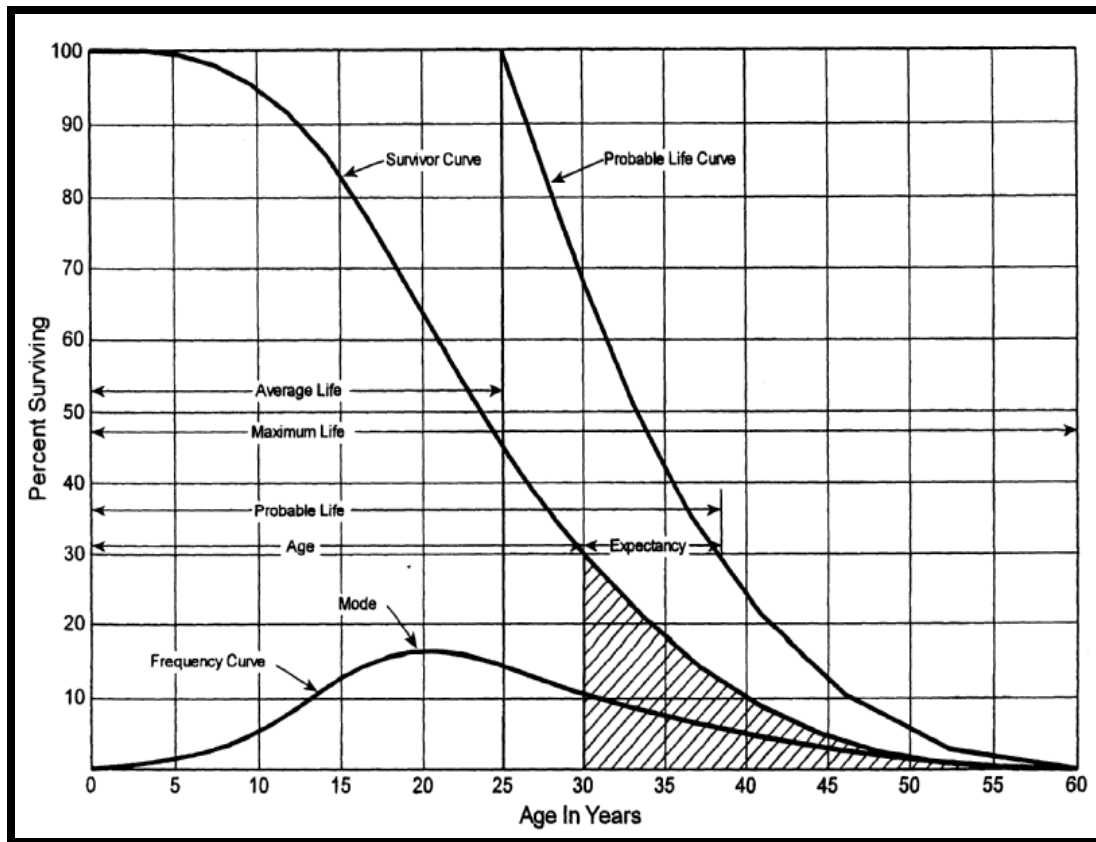
⁵ W.C. Fitch and F.K. Wolf, DEPRECIATION SYSTEMS, at page 289 (Iowa State Press, 1994).

1 A. Alliance used the straight-line (method), ALG (procedure), remaining-life (technique)
2 depreciation method for this Depreciation Study. This is the same methodology used by
3 PSCo and accepted by the Commission for PSCo's last depreciation rate update to the
4 Transmission Formula Rate in Docket No. ER20-251-000.

5 **Q. WHAT IS A SURVIVOR CURVE?**

6 A. A survivor curve represents the percentage of property remaining in service at various
7 age intervals. The Iowa Curves, the predominantly used survivor curve method in the
8 utility industry, are the result of an extensive investigation of life characteristics of
9 physical property made at Iowa State College Engineering Experiment Station in the first
10 half of the prior century. Through common usage, revalidation and regulatory
11 acceptance, the Iowa Curves have become a descriptive standard for the life
12 characteristics of industrial property. An example of an Iowa Curve is shown below in
13 Figure LJW-D-2. For more detail on survivor curves, see pages 9-12 of Exhibit No. XES
14 – 201.

FIGURE LJW-D-2
Survivor Curve



Q. HOW IS A SURVIVOR CURVE USED IN THE DEPRECIATION STUDY?

A. Most property groups can be closely fitted to one Iowa Curve with a unique average service life. By blending of judgment concerning current conditions and future trends with the matching of historical data, the depreciation analyst can make an informed selection of an account's average service life and survivor curve. When selecting an average service life, the analyst also selects a survivor curve. When recommending depreciation rates, the depreciation analyst selects the average service life and survivor curve that are used to compute remaining life, theoretical reserve, and reserve reallocation.

1 **C. DETERMINATION OF THE DEPRECIATION RATES**

2 **Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR DIRECT**
3 **TESTIMONY?**

4 A. In this section, I explain how depreciation rates are determined, and I identify the formula
5 for depreciation rates. This portion of my Direct Testimony also explains and fully
6 discusses each portion of the depreciation rate formula that is supported by the
7 Depreciation Study. Section III is broken into the following subparts, which align with
8 the components of the depreciation rate formula that the Depreciation Study supports:
9 (1) The Depreciation Rate Formula; (2) Theoretical Reserve and Reserve Reallocation;
10 (3) Net Salvage Amounts or Percentages; (4) Remaining Life Analysis; and
11 (5) Depreciation Rates and Depreciation Accrual Rates.

12 **1. THE DEPRECIATION RATE FORMULA**

13 **Q. HOW ARE THE DEPRECIATION RATES DETERMINED?**

14 A. The formula to derive depreciation rates calculates annual depreciation accrual amounts
15 for each group by dividing the original cost of the asset (gross plant), less allocated
16 depreciation reserve, less estimated net salvage, by the group's respective remaining life.
17 The resulting annual accrual amounts for all depreciable property within an account are
18 accumulated, and the total is divided by the original cost (gross plant) of all depreciable
19 property within the account to determine the depreciation rate.

20 **Q. WHAT PORTION OF THE FORMULA USED TO DERIVE DEPRECIATION**
21 **RATES IS SUPPORTED BY THE DEPRECIATION STUDY?**

22 A. The Depreciation Study determines several pieces of the overall formula used to derive
23 depreciation rates. The portions of the formula derived by the Depreciation Study are:

- 1 • **Depreciation Reserve Balance and Reserve Reallocation:** To calculate
2 depreciation reserve, the PSCo provided Alliance with the actual gross plant
3 balance amounts and the actual depreciation reserve as of December 31, 2020.
4 Taking that data, Alliance calculated a new depreciation reserve balance that is
5 subtracted from gross plant after the reserve reallocation is conducted. As
6 discussed below, to determine the depreciation reserve, Alliance calculated the
7 theoretical reserve prior to the reserve reallocation. Both of these calculations
8 (theoretical reserve and reserve reallocation) are supported by the Depreciation
9 Study.
- 10 • **Net Salvage Amounts or Percentages:** The Depreciation Study supports the
11 overall net salvage percentages but relies upon a decommissioning study for the
12 Production portion of the net salvage amount determination. Specifically, for
13 PSCo's Steam, Hydro, and Other Production Plants, Alliance used estimates
14 reflected in a 2020 Decommissioning Study conducted by 1898 Co., part of
15 Burns & McDonnell. For the other accounts (Transmission, Distribution,
16 Electric General and Common Plant) Alliance calculated the net salvage
17 percentages reflected in the Depreciation Study. For these plant accounts, the
18 salvage and removal cost percentages were calculated by dividing the current
19 cost of salvage or removal, as supported by the Depreciation Study, by the
20 original installed cost of the retired asset.
- 21 • **Remaining Life:** The Depreciation Study supports the remaining life
22 calculation by determining the appropriate average service lives and retirement
23 survivor curve for each account within a functional group.
- 24 • **Resulting Annual Depreciation Accrual and Depreciation Rates:** As
25 discussed above, Alliance calculated the depreciation rates, and then derived
26 the annual accrual amounts from these rates. The computations of the annual
27 depreciation rates and annual accrual amounts are shown in Appendices A, A-
28 1, A-2, and A-3 of Exhibit No. XES-201.

29 I describe in more depth below how the Depreciation Study depicts each component of the
30 formula, as well as the Depreciation Study results for each component.

31 2. **THEORETICAL RESERVE AND RESERVE REALLOCATION**

32 **Q. WHAT PURPOSE DOES THEORETICAL RESERVE SERVE IN A**
33 **DEPRECIATION STUDY?**

34 **A.** The theoretical reserve represents the portion of a property group's cost that would have
35 been accrued as depreciation reserve if current expectations were used throughout the life

1 of the property group for future depreciation accruals. The theoretical reserve for the
2 asset group serves as a point of comparison to the book reserve to determine if the
3 unrecovered investment of the asset and its removal cost are over or under-accrued.

4 **Q. HOW DOES THE DEPRECIATION STUDY DETERMINE THE**
5 **THEORETICAL RESERVE?**

6 A. In the Depreciation Study, Alliance computed theoretical reserves based on projected
7 plant balances as of December 31, 2020. Alliance calculated the theoretical reserve using
8 a reserve model that relies on a prospective concept relating future retirement and accrual
9 patterns for property, given current life and salvage estimates. More specifically,
10 Alliance determined the theoretical reserve of a property group from the estimated
11 remaining life of the group, the total life of the group, and estimated net salvage. This
12 computation for the straight-line, remaining-life theoretical reserve ratio, which Alliance
13 describe in more detail starting on page 15 of Exhibit No. XES – 201, involves
14 multiplying the vintage balances within the property group by the theoretical reserve ratio
15 for each vintage. The calculation used in the Depreciation Study is the same calculation
16 the Company used to develop the depreciation rates approved by the CoPUC in the
17 Company's most recent Electric Rate Case, which was Proceeding No. 21AL-0317E.

18 **Q. HOW DOES THE THEORETICAL RESERVE RELATE TO THE RESERVE**
19 **REALLOCATION?**

20 A. As part of the Depreciation Study, Alliance performed a depreciation reserve
21 reallocation, which is based on the theoretical reserves calculated in the Depreciation
22 Study. If the accumulated book depreciation reserve as compared to the theoretical
23 reserve results in some assets being over-recovered (a positive value when subtracting the

1 theoretical reserve from the book reserve) and others being under-recovered (a negative
2 value when subtracting the theoretical reserve from the book reserve) within the
3 functional class or group, then this difference can be used to rebalance the accounts
4 within the functional class or group using the reserve reallocation.

5 **Q. WHAT IS RESERVE REALLOCATION?**

6 A. Reserve reallocation is when the book reserve is realigned among accounts within a
7 functional group based on the theoretical reserve for each account within that function.

8 **Q. DID YOU ALIGN THE COMPANY'S DEPRECIATION RESERVE WITH THE**
9 **LIFE AND NET SALVAGE CHARACTERISTICS OF THE ASSETS IN EACH**
10 **FUNCTION?**

11 A. Yes. In the process of analyzing the Company's depreciation reserve, Alliance observed
12 that the depreciation reserve positions of the accounts were generally not in line with the
13 life and net salvage characteristics found in the analysis of the Company's assets. To
14 allow the relative reserve positions of each account within a function to mirror the life
15 and net salvage characteristics of the underlying assets, Alliance reallocated the
16 depreciation reserves for all accounts within each function. Since the basis of the current
17 depreciation rates incorporates different average service lives and net salvage percentages
18 from the proposed parameters in this filing, I believe reserve reallocation is the best
19 approach based upon sound depreciation practice to resolve the differences in reserve
20 position.

1 **Q. DOES THE REALLOCATION OF THE DEPRECIATION RESERVE CHANGE**
2 **THE TOTAL RESERVE?**

3 A. No, the reallocation of the depreciation reserve does not change the total reserve. The
4 depreciation reserve represents the amounts that have been collected as a systematic
5 allocation of the cost of an asset over its useful life, including any net salvage that may be
6 required to remove that asset from service upon retirement. The reallocation process
7 does not retroactively change the total reserve for each function; it simply reallocates the
8 reserve between accounts in the function. The reallocated depreciation reserves agree in
9 total to the projected reserve balances at December 31, 2020.

10 **Q. IS DEPRECIATION RESERVE REALLOCATION A SOUND PRACTICE?**

11 A. Depreciation reserve allocation is a sound depreciation practice. The CoPUC and the
12 Commission have incorporated this approach in the depreciation rates approved for both
13 the Company and at least one other regulated utility that I am aware of.⁶ Furthermore,
14 depreciation reserve reallocation was incorporated into the study supporting PSCo's prior
15 depreciation rate case in Docket No. ER20-251-000, and it is my understanding that other
16 utilities have also used a reserve reallocation in their depreciation rate filings.⁷

17 The National Association of Regulatory Utility Commissioners endorsed the
18 practice in its 1968 publication of PUBLIC UTILITY DEPRECIATION PRACTICES, explaining
19 that reallocation of the depreciation reserve is appropriate "...where the change in the
20 view concerning the life of property is so drastic as to indicate a serious difference

⁶ See, e.g., Docket No. ER20-251-000 and ER20-1371-000; CoPUC Proceeding Nos. 20AL-0049G, 19AL-0268E, 16A-0231E, 14AL-0660E, 12AL-1269ST, 12AL-1268G, 11AL-947E, 09AL-299E, 06AL-234EG for Public Service. See Proceeding No. 15AL-0299G for Atmos Colorado.

⁷ See Docket Nos. ER12-212-000, ER15-949-000, ER17-191-000, ER17-1664-000, and ER18-56-000.

1 between the theoretical and the book reserve.”⁸ Additionally, the 1996 edition of PUBLIC
2 UTILITY DEPRECIATION PRACTICES states that “theoretical reserve studies also have been
3 conducted for the purpose of allocating an existing reserve among operating units or
4 accounts.”⁹

5 For PSCo, the Depreciation Study demonstrates that there have been significant
6 changes in the life and net salvage characteristics of the property since the current accrual
7 rates were established. These changes have created a significant difference between the
8 theoretical and the book reserve in each functional group, which makes the reallocation
9 of the depreciation reserve appropriate in this instance.

10 **Q. WHY IS IT IMPORTANT FOR THE DEPRECIATION RESERVE TO**
11 **CONFORM TO THE THEORETICAL RESERVE?**

12 A. It is important for the depreciation reserve to conform to the theoretical reserve because
13 this sets the reserve at a level necessary to sustain the regulatory concept of
14 intergenerational equity among the Company’s customers, as well as sets the depreciation
15 rates at the appropriate level based on current parameters and expectations.

16 **Q. PLEASE EXPLAIN HOW THE REALLOCATION OF DEPRECIATION**
17 **RESERVES IS CONDUCTED IN THE DEPRECIATION STUDY.**

18 A. Alliance first computed the total theoretical reserve for asset groups within each function.
19 Then, to reallocate depreciation reserves within each function using the theoretical
20 reserve model, Alliance computed a proration factor by developing a ratio of the total

⁸ Public Utility Depreciation Practices, published by the National Association of Regulatory Utility Commissioners, at page 48 (1968).

⁹ Public Utility Depreciation Practices, published by the National Association of Regulatory Utility Commissioners, at page 188 (1996).

1 book reserve to the total theoretical reserve by functional class. After each theoretical
2 reserve was computed, Alliance multiplied it by the proration factor to derive the
3 reallocated book reserve of each functional group. After computing the reserve
4 reallocation, Alliance calculated recommended depreciation rates and expense in
5 Appendices A, A-1, and A-2 of Exhibit No. XES – 202 for the Company's plant in
6 service assets.

7 **Q. WERE THERE ANY UNIQUE CIRCUMSTANCES ASSOCIATED WITH THE**
8 **RESERVE REALLOCATION CONDUCTED FOR THIS STUDY?**

9 A. Yes. The Ponnequin Wind Farm was retired in 2015, but accumulated depreciation
10 expense associated with this unit did not cover the cost of the plant and removal costs.
11 As such, the unrecovered costs were recorded in FERC Account 108, Accumulated
12 Provision for Depreciation (Depreciation Reserve). The Company instructed that the
13 Depreciation Study address these unrecovered costs for the Ponnequin Wind Farm by
14 including the costs in the reserve reallocation for the Other Production functional class.
15 After the reserve reallocation, the entire unrecovered balance for the Ponnequin Wind
16 Farm is fully accrued for its removal costs.

17 **3. NET SALVAGE AMOUNTS OR PERCENTAGES**

18 **Q. WHAT IS NET SALVAGE AS DETERMINED FOR ALL THE COMPANY'S**
19 **PLANT ASSETS?**

20 A. While discussed more fully in the Depreciation Study itself, net salvage is the difference
21 between the gross salvage (what the asset was sold for) and the COR (cost to remove and
22 dispose of the asset). If the COR exceeds gross salvage, net salvage is negative. Some
23 plant assets can experience significant negative removal cost percentages due to the

1 amount of removal cost and the timing of any capital additions versus the retirement.

2 Salvage and removal cost percentages are calculated by dividing the current cost of
3 salvage or removal by the original installed cost of the assets retired.

4 **Q. HOW IS NET SALVAGE DETERMINED IN THE DEPRECIATION STUDY?**

5 A. As discussed above, for the Company's Steam, Hydro, and Other Production Plant, the
6 Depreciation Study uses the decommissioning (cost of removal) estimates reflected in the
7 Decommissioning Study and the currently approved interim net salvage percentages to
8 determine the total net salvage amounts. The Depreciation Study separately calculates
9 the net salvage percentages for the Transmission, Distribution, Electric General and
10 Common Plant accounts.

11 **Q. HOW WAS THE NET SALVAGE PERCENTAGE FOR EACH ASSET GROUP**
12 **IN TRANSMISSION, DISTRIBUTION, ELECTRIC GENERAL, AND COMMON**
13 **PLANT DETERMINED?**

14 A. To determine the appropriate net salvage percentages for each account, Alliance started
15 by using an industry-standard method that divides the current cost of salvage or removal
16 by the original installed cost of the assets retired. However, Alliance also applied
17 judgment to select a net salvage percentage that represents the future expectations for
18 each account. To apply this judgment, Alliance compiled historical salvage and removal
19 data by functional group and account to determine values and trends in gross salvage and
20 removal cost. As detailed in the Depreciation Study, for most accounts, data for
21 retirements, gross salvage and COR covered the period from 2000-2020. Alliance
22 calculated moving averages with this data to remove timing differences between
23 retirement and salvage and removal cost; those moving averages are analyzed over

1 periods varying from one to 10 years. These calculations are found in Appendices E-2
2 and E-3 of Exhibit No. XES – 202.

3 **Q. IS IT SUFFICIENT TO ANALYZE HISTORICAL DATA TO FORM YOUR LIFE**
4 **AND NET SALVAGE ESTIMATES?**

5 A. No. Historical lives and salvage data are factors to consider in making life and net
6 salvage recommendations, but it is crucial to incorporate future trends, changes in
7 equipment and Company-specific operational information before finally making life and
8 net salvage recommendations. Once all the calculations and data are prepared, Alliance
9 meets with experts from the Company's operations and takes into account their judgment,
10 Company expectations and trends to determine the appropriate net salvage percentages.
11 A summary of the proposed net salvage percentages is shown below in Table LJW-D-1.

TABLE LJW-D-1
Comparison of Net Salvage Percentages

		<u>Current Net Salvage Percentage</u>	<u>Proposed Net Salvage Percentage</u>	<u>Difference in Net Salvage Percentages</u>
	<u>ELECTRIC INTANGIBLE PLANT</u>			
301.00	Organization Costs			
302.00	Franchises and Consents			
303.00	Miscellaneous Intangible Plant			
303.03	Misc Computer Software - 3 Year	0%	0%	0%
303.07	Misc Computer Software - 7 Year	0%	0%	0%
303.10	Misc Computer Software - 10 Year	0%	0%	0%
303.15	Misc Computer Software - 15 Year	0%	0%	0%
	<u>COMMON INTANGIBLE PLANT</u>			
301.00	Organization Costs			
302.00	Franchises and Consents			
303.03	Miscellaneous Computer Software - 3 Year	0%	0%	0%
303.07	Miscellaneous Computer Software - 7 Year	0%	0%	0%
303.10	Miscellaneous Computer Software - 10 Year	0%	0%	0%
303.15	Miscellaneous Computer Software - 15 Year	0%	0%	0%
	<u>PRODUCTION PLANT</u>			
312.20	Coal Cars	0%	0%	0%
	<u>TRANSMISSION PLANT</u>			
350.20	Land Rights	0%	0%	0%
352.00	Structures and Improvements	-5%	-10%	-5%
353.00	Station Equipment	-15%	-20%	-5%
354.00	Towers and Fixtures	-20%	-40%	-20%
355.00	Poles and Fixtures	-40%	-60%	-20%
356.00	OH Conductors and Devices	-25%	-30%	-5%
357.00	UG Conduit	0%	-5%	-5%
358.00	UG Conductors and Devices	0%	-5%	-5%
359.00	Roads and Trails	0%	0%	0%
	<u>DISTRIBUTION PLANT</u>			
360.20	Land Rights	0%	0%	0%
361.00	Structures and Improvements	-5%	-10%	-5%
362.00	Station Equipment	-10%	-20%	-10%
363.00	Energy Storage Equipment	NA	0%	NA
364.00	Poles, Towers and Fixtures	--50%	-60%	-10%
365.00	OH Conductors and Devices	-40%	-50%	-10%
366.00	UG Conduit	-25%	-30%	-5%
367.00	UG Conductors and Devices	-5%	-10%	-5%
368.00	Line Transformers	-10%	-10%	0%
369.00	Services	-30%	-40%	-10%
369.10	Services-Overhead	-30%	-40%	-10%

369.20	Services-Underground	-30%	-40%	-10%
370.00	Meters	0%	0%	0%
370.02	Meters- AGIS- AMI Equipment	NA	0%	NA
370.20	Automated Meter Reading Equipment	0%	0%	0%
371.00	Installation on Customer Premises	-20%	-20%	0%
	Installations on Customers' Premises-	NA	0%	
371.40	EV			NA
373.00	Street Lighting and Signal Systems	-25%	-25%	0%

ELECTRIC GENERAL PLANT

389.20	Land Rights	0%	0%	0%
390.00	Structures and Improvements	-5%	-5%	0%
391.00	Office Furniture and Equipment	0%	0%	0%
391.20	Computer Hardware	0%	0%	0%
	Transportation Equipment –	10%	10%	
392.10	Automobiles			0%
392.20	Transportation Equipment - Light Trucks	10%	10%	0%
392.30	Transportation Equipment – Trailers	20%	20%	0%
	Transportation Equipment - Heavy	10%	10%	
392.40	Trucks			0%
393.00	Stores Equipment	0%	0%	0%
394.00	Tools, Shop and Garage Equipment	0%	0%	0%
395.00	Laboratory Equipment	0%	0%	0%
396.00	Power Operated Equipment	15%	30%	15%
397.00	Communication Equipment	0%	0%	0%
398.00	Miscellaneous Equipment	0%	0%	0%

COMMON GENERAL PLANT

389.20	Land Rights	0%	0%	0%
390.00	Structures and Improvements	-10%	-10%	0%
	Structures and Improvements -			
390.07	Leasehold Improvements			
	Structures and Improvements - 1800			
390.85	Larimer			

<u>Current Net</u>	<u>Proposed Net</u>	<u>Difference in</u>
<u>Salvage</u>	<u>Salvage</u>	<u>Net Salvage</u>
<u>Percentage</u>	<u>Percentage</u>	<u>Percentages</u>

COMMON GENERAL PLANT

391.00	Office Furniture and Equipment	0%	0%	0%
391.04	Computer Hardware	0%	0%	0%
	Transportation Equipment –		10%	
392.10	Automobiles	10%		0%
392.20	Transportation Equipment - Light Trucks	10%	10%	0%
392.30	Transportation Equipment – Trailers	20%	20%	0%
	Transportation Equipment - Heavy		10%	
392.40	Trucks	10%		0%
393.00	Stores Equipment	0%	0%	0%
394.00	Tools and Shop Equipment	0%	0%	0%
395.00	Laboratory Equipment	0%	0%	0%
396.00	Power Operated Equipment	15%	30%	15%
397.00	Communication Equipment	0%	0%	0%

398.00 Miscellaneous Equipment

0%

0%

0%

Q. PLEASE DESCRIBE SOME OF THE CHANGES IN THE NET SALVAGE PERCENTAGES FOR THE VARIOUS ACCOUNTS.

A. The detailed analysis of each account is described fully in Exhibit No. XES – 201, starting at page 93. Net salvage is trending toward higher negative net salvage due to the increased cost of labor, safety, and environmental issues related to retiring utility assets and the longer lives experienced for many assets. For PSCo, 16 accounts decreased (more negative), while only two accounts increased. Examples of some of the changes in net salvage are:

- The most significant decreases (more negative) in net salvage percentages were in: Transmission Account 355, Poles & Fixtures, which decreased from negative 40 to negative 60 percent; Distribution Services (Accounts 369.00, 369.10, and 369.20), which decreased from negative 30 to negative 40 percent and Accounts 362- Station Equipment, 364 Poles Towers and Fixtures, and 365 OH Conductors and Devices, which changed by negative 10 percent. For both the Transmission and Distribution accounts, the most recent five-year and 10-year net salvage percentages generally indicate higher negative percentages, as detailed in the Depreciation Study. In addition, the data indicates that negative salvage has increased steadily since 2007. In fact, several factors impacting removal costs within the Transmission function are enumerated in the Depreciation Study. See pages 108-110 of Exhibit XES-201.
- The two accounts with more positive net salvage are Electric General and Common General Accounts 396 for power-operated equipment. The Depreciation Study indicates that the Company is receiving higher net salvage proceeds in recent years for assets in these accounts. The data Alliance reviewed, along with their judgment, indicated moving to a positive 30 percent net salvage from 15 percent.

4. REMAINING LIFE ANALYSIS

Q. DOES THE DEPRECIATION STUDY CONDUCT LIFE ANALYSIS FOR PRODUCTION UNITS?

1 A. Yes. Revised terminal retirement dates are inputs used in the Depreciation Study to
2 derive the average remaining life depreciation rate for generation. The dates are
3 consistent with current operating expectations, environmental legislation, and resource
4 plans.

5 It should be noted, however, that the Depreciation Study does treat one group of
6 assets within Steam Production uniquely. Coal cars, within Account 312, are modeled
7 somewhat differently than other assets within Steam Production since these assets are not
8 tied to any particular generating station. As such, Alliance used Company history to
9 develop a service life recommendation. The Depreciation Study recommends a 24-year
10 life for this account.

11 **Q. CAN YOU EXPLAIN INTERIM RETIREMENT PROJECTIONS AND WHAT**
12 **PURPOSES THEY SERVE IN THE DEPRECIATION STUDY?**

13 A. Yes. As detailed in the Depreciation Study, Alliance used interim retirement Iowa curves
14 to model the retirement of individual assets within primary plant accounts for each
15 generating unit prior to the terminal retirement of the facility. The life span procedure
16 assumes all assets are depreciated (straight-line) for the same number of periods and will
17 retire at the same time (the terminal retirement date). Adding interim retirement curves
18 to this procedure reflects the fact that some of the assets at a power plant will not survive
19 to the end of the life of the facility and should be depreciated (straight-line) more quickly
20 and retired earlier than the terminal life of the overall facility. By applying interim
21 retirements, the Depreciation Study recognizes that generating units will have retirements
22 of depreciable property before the end of their lives. For purposes of the Depreciation
23 Study, the Company asked Alliance to change from using interim retirement ratios to an

1 interim retirement Iowa curve to estimate interim retirement activity. The Xcel Energy
2 Operating Companies in other jurisdictions use Iowa curves, and PSCo wishes to align its
3 methodology for its production assets with the methodology used in other Xcel Energy
4 Operating Companies. According to Alliance, the Iowa curve methodology is the
5 mainstream and more accurate approach used across the utility industry. The proposed
6 interim retirement Iowa curves and lives recommended for production accounts are
7 shown in Exhibit No. XES – 201 at Appendix C-1.

8 **Q. IS NET SALVAGE ACCOUNTED FOR SEPARATELY FOR THESE INTERIM**
9 **RETIREMENTS?**

10 A. Yes. Alliance calculated an interim net salvage percentage that represents the estimated
11 removal cost for interim retirements that will occur annually over the remaining life of
12 each generating unit. The selection of interim retirement curves goes with the selection
13 of interim net salvage percentages. Both should be considered in setting depreciation
14 accrual rates. Most of the interim net salvage percentages didn't change. The proposed
15 interim retirement net salvage percentages are shown in Appendix C-1, and a detailed
16 history is shown in Appendix E-1 of Exhibit No. XES – 201.

17 **Q. WHAT METHOD DOES THE DEPRECIATION STUDY USE TO ANALYZE**
18 **HISTORICAL DATA FOR TRANSMISSION, DISTRIBUTION, ELECTRIC**
19 **GENERAL, AND COMMON PLANT TO DETERMINE LIFE**
20 **CHARACTERISTICS?**

21 A. For the Depreciation Study, Alliance analyzed all Transmission, Distribution, Electric
22 General, and Common Plant accounts using actuarial analysis (retirement rate method) to
23 estimate the life of the property in each account. In much the same manner as human

mortality is analyzed by actuaries, depreciation analysts use models of property mortality characteristics that have been validated in research and empirical applications. The current and proposed net salvage percentages are shown in Appendix C-2, and a detailed history is shown in Appendix E-2 and E-3 of Exhibit No. XES – 201.

Q. HOW DID YOU DETERMINE THE AVERAGE SERVICE LIVES FOR TRANSMISSION, DISTRIBUTION, ELECTRIC GENERAL, AND COMMON PLANT?

A. As noted above, Alliance used actuarial analysis to determine the appropriate average service lives for each account in Transmission, Distribution, Electric General, and Common. Graphs and tables supporting the actuarial analysis and the chosen Iowa Curves used to determine the average service lives for analyzed accounts appear in the “Determination of the Lives” section of Exhibit No. XES – 201, pages 23-92. A summary comparison of the depreciable lives is shown in Table LJW-D-2 below.

TABLE LJW-D-2
Comparison of Depreciable Lives

<u>Account Number</u>	<u>Description</u>	<u>Current Average Service Life</u>	<u>Proposed Average Service Life</u>	<u>Difference in Average Service Life</u>
<u>ELECTRIC INTANGIBLE PLANT</u>				
301.00	Organization Costs			
302.00	Franchises and Consents			
303.00	Miscellaneous Intangible Plant			
303.03	Misc Computer Software - 3 Year	3	3	0
303.07	Misc Computer Software - 5 Year	7	7	0
303.10	Misc Computer Software - 10 Year	10	10	0
303.15	Misc Computer Software - 15 Year	15	15	0
<u>COMMON INTANGIBLE PLANT</u>				
301.00	Organization Costs			
302.00	Franchises and Consents			
303.03	Miscellaneous Computer Software - 3 Year	3	3	0
303.07	Miscellaneous Computer Software - 7 Year	7	7	0

303.10	Miscellaneous Computer Software - 10 Year	10	10	0
303.15	Miscellaneous Computer Software - 15 Year	15	15	0

<u>Account Number</u>	<u>Description</u>	<u>Current Average Service Life</u>	<u>Proposed Average Service Life</u>	<u>Difference in Average Service Life</u>
<u>PRODUCTION PLANT</u>				
312.20	Coal Cars	24	24	0
<u>TRANSMISSION PLANT</u>				
350.20	Land Rights	100	100	0
352.00	Structures and Improvements	88	60	-28
353.00	Station Equipment	58	58	0
354.00	Towers and Fixtures	81	81	0
355.00	Poles and Fixtures	62	62	0
356.00	OH Conductors and Devices	70	75	5
357.00	UG Conduit	60	65	5
358.00	UG Conductors and Devices	50	50	0
359.00	Roads and Trails	92	92	0
<u>DISTRIBUTION PLANT</u>				
360.20	Land Rights	90	100	10
361.00	Structures and Improvements	65	62	-3
362.00	Station Equipment	57	56	-1
363.00	Energy Storage Equipment	NA	10	NA
364.00	Poles, Towers and Fixtures	54	57	3
365.00	OH Conductors and Devices	50	56	6
366.00	UG Conduit	70	73	3
367.00	UG Conductors and Devices	47	51	4
368.00	Line Transformers	47	49	2
369.00	Services	50	56	6
369.10	Services-Overhead	50	56	6
369.20	Services-Underground	50	56	6
370.00	Meters	24	24	0
370.02	Meters-AGIS-AMI Equipment	NA	20	NA
370.20	Automated Meter Reading Equipment	10	10	0
371.00	Installation on Customer Premises	25	25	0
371.40	Installations on Customer's Premises-EV	NA	10	NA
373.00	Street Lighting and Signal Systems	41	28	-13
<u>ELECTRIC GENERAL PLANT</u>				
389.20	Land Rights	60	60	0
390.00	Structures and Improvements	45	45	0
391.00	Office Furniture and Equipment	20	20	0
391.20	Computer Hardware	6	6	0
392.10	Transportation Equipment - Automobiles	12	7	-5
392.20	Transportation Equipment - Light Trucks	12	7	-5
392.30	Transportation Equipment - Trailers	25	15	-10

392.40	Transportation Equipment - Heavy Trucks	14	10	-4
393.00	Stores Equipment	30	30	0
<u>Account</u> <u>Number</u>	<u>Description</u>	<u>Current</u> <u>Average</u> <u>Service Life</u>	<u>Proposed</u> <u>Average</u> <u>Service</u> <u>Life</u>	<u>Difference</u> <u>in Average</u> <u>Service Life</u>
394.00	Tools, Shop and Garage Equipment	25	15	-10
395.00	Laboratory Equipment	10	10	0
396.00	Power Operated Equipment	14	14	4
397.00	Communication Equipment	15	15	0
398.00	Miscellaneous Equipment	20	20	0
<u>COMMON GENERAL PLANT</u>				
389.20	Land Rights	0	60	60
390.00	Structures and Improvements	45	45	0
390.07	Structures and Improvements - Leasehold Improvements			
390.85	Structures and Improvements - 1800 Larimer			
391.00	Office Furniture and Equipment	20	20	0
391.04	Computer Hardware	6	6	0
392.10	Transportation Equipment - Automobiles	12	7	-5
392.20	Transportation Equipment - Light Trucks	12	7	-5
392.30	Transportation Equipment - Trailers	25	15	-10
392.40	Transportation Equipment - Heavy Trucks	14	10	-4
393.00	Stores Equipment	30	30	0
394.00	Tools and Shop Equipment	25	15	-10
395.00	Laboratory Equipment	10	10	0
396.00	Power Operated Equipment	14	10	-4
397.00	Communication Equipment	15	15	0
398.00	Miscellaneous Equipment	20	20	0

1 **Q. PLEASE DESCRIBE SOME OF THE CHANGES IN THE AVERAGE SERVICE**
2 **LIVES FOR THE VARIOUS TRANSMISSION, DISTRIBUTION, ELECTRIC**
3 **GENERAL, AND COMMON GENERAL ACCOUNTS?**

4 **A. For the 52 Electric Transmission, Distribution, Electric General, and Common General**
5 **accounts, there are 13 accounts with increasing lives, 15 accounts with decreasing lives,**

1 and 24 accounts that stayed the same.¹⁰ Examples of some of the significant changes in
2 average service lives for Electric Transmission, Distribution, and Electric General Plant
3 are as follows:

- 4 • The largest increases in life were in: Transmission Account 365, Overhead
5 (“OH”) Conductors & Devices, which increased by 6 years; Electric
6 Distribution Services (369.00, 369.10, 369.20), which increased by 6 years;
7 Transmission Account 356, OH Conductors and Devices, which increased by
8 5 years; and Transmission Account 357 UG Conduit, which increased by 5
9 years. The Depreciation Study explains the increase for each account.
- 10 • The largest decreases in life were: Transmission Account 352, Structures and
11 Improvements, which decreased by 28 years; and Electric Account 373, Street
12 Lighting and Signal Systems, which decreased by 13 years. The Depreciation
13 Study explains the decrease for each account.

14 **Q. IS THERE A SEPARATE METHODOLOGY USED IN THE DEPRECIATION**
15 **STUDY TO ACCOUNT FOR THE REMAINING LIFE FOR CERTAIN**
16 **ACCOUNTS?**

17 A. Yes. The Company proposes to continue Vintage Group Accounting for Electric
18 General and Common General Accounts 391-398. Vintage Group Accounting is
19 described in FERC Accounting Release 15 (“AR 15”), commonly referred to as General
20 Plant Amortization, Vintage Year Accounting For General Plant Accounts, dated January
21 1, 1997. AR 15 allowed utilities to use a simplified method of accounting for General
22 Plant assets, excluding structures and improvements (referred to as “General Plant”). The
23 AR 15 release allowed high-volume, low-cost assets to be amortized over the associated
24 useful life, eliminated the need to track individual assets, and allowed a retirement to be

¹⁰ The 51 accounts do not include any Electric Intangible Plant, Common Intangible Plant, Production Plant, or any newly created accounts.

1 booked at the end of the depreciable life. This method is often referred to as

2 “amortization of General Plant.”

3 **Q. WHAT LEVEL OF DETAIL IS MAINTAINED IN THE ACCOUNTING**
4 **RECORDS PURSUANT TO AR 15?**

5 A. Since the Company adopted AR 15 many years ago, the level of detail maintained in the
6 asset records has changed from prior periods, when items were tracked separately. Now,
7 the plant asset balances are maintained by vintage installed, with the retirement being
8 recorded when book depreciation has been completed. The empirical retirement data for
9 actuarial or semi-actuarial analysis is no longer available; however, the determination of
10 useful life can be made appropriately with the use of manufacturer expected lives,
11 technological obsolescence, business operations and practices, known causes of
12 retirement, and changes in expected future utilization, as well as judgment based on lives
13 experienced for similar assets across the industry. More details related to AR 15 appear
14 on page 88 of the Depreciation Study in Exhibit No. XES – 201.

15 **Q. PLEASE DESCRIBE THE RESULTS OF THE VINTAGE GROUP**
16 **DEPRECIATION RATES COMPUTED FOR ACCOUNTS 391-398 IN**
17 **ELECTRIC GENERAL AND COMMON GENERAL PLANT.**

18 A. These computations are shown in shown on Appendix A-1 and A-2 of Exhibit No. XES –
19 201. The Company is including any depreciation reserve difference between the actual
20 and theoretical reserve in the amortization accrual for each account.

1 5. **DEPRECIATION RATES AND DEPRECIATION ACCRUAL**
2 **RATES**

3 **Q. HAVING DETERMINED THE THEORETICAL RESERVE, CONDUCTED THE**
4 **RESERVE REALLOCATION, CALCULATED NET SALVAGE AND**
5 **DETERMINED THE REMAINING LIVES THROUGH THE DEPRECIATION**
6 **STUDY, PLEASE DESCRIBE THE FINAL STEPS, CALCULATION OF THE**
7 **DEPRECIATION RATES AND ACCRUAL RATES.**

8 A. The Depreciation Study calculates the depreciation accrual rates using the same
9 methodology (with the exception of the production interim retirement calculations for
10 Production as discussed earlier) used in developing the depreciation rates approved by the
11 Commission in Docket No. ER20-251. The computations of accrual rates are shown in
12 Appendix A of Exhibit No. XES – 201.

13 **D. **CHANGE IN DEPRECIATION EXPENSE AS A RESULT OF THE****
14 **MODIFIED DEPRECIATION RATES**

15 **Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR DIRECT**
16 **TESTIMONY?**

17 A. In this section of my Direct Testimony, I discuss the change in depreciation expense as a
18 result of the modified depreciation rates. Specifically, I explain why PSCo's depreciation
19 expense is increasing.

20 **Q. PLEASE SUMMARIZE THE DEPRECIATION STUDY RESULTS WITH**
21 **RESPECT TO DEPRECIATION CHANGES IN DEPRECIATION AND**
22 **AMORTIZATION EXPENSE.**

23 A. Based on the revised depreciation rates indicated in the Depreciation Study, as applied to
24 projected plant balances as of December 31, 2020, the overall change in annual

depreciation and amortization expense is an increase of \$49.5 million. As shown below in Table LJW-D-3, this increase reflects an increase of \$28.6 million in Production, an increase of \$5.2 million in Transmission, an increase of \$6.6 million in Distribution, an increase of \$6.8 million in Electric General, and an increase of \$2.3 million for Common General. Detailed Production rates by plant and account are shown in Appendix A, Appendix A-1 (General Amortized), and Appendix A-2 (Common General) of Exhibit No. XES-202. Rates by account for Transmission, Distribution, Electric General and Common General are shown in Appendix A of Exhibit No. XES – 202.

TABLE LJW-D-3
Change in Depreciation Expense due to Proposed Changes in
Depreciation Rates by Functional Class

	Projected Plant	Approved Rates	Proposed Rates	Difference
Functional Class	1/1/2020	Depreciation	Depreciation	Depreciation
		Expense	Expense	Expense
	\$	\$	\$	\$
Electric Intangible	171,807,113	17,415,635	17,415,635	0
Steam Production	3,151,855,493	95,845,385	114,639,560	18,794,175
Hydro Production	156,048,107	5,345,172	8,640,944	3,295,772
Other Production	1,969,172,841	51,500,383	61,254,206	9,753,822
Wind Production	1,552,295,622	67,369,630	64,083,964	-3,285,666
Total Production	6,829,372,062	220,060,571	248,618,674	28,558,103
Transmission	2,886,692,046	55,276,278	60,477,708	5,201,430
Distribution	5,728,859,142	133,984,942	140,597,496	6,612,554
Electric General	412,554,590	24,042,508	30,855,980	6,813,472
Total Transmission, Distribution, and General	9,028,105,777	213,303,728	231,931,184	18,627,456
Total Electric	16,029,284,953	450,779,933	497,965,493	47,185,559
Common Intangible	385,366,955	44,944,403	44,944,403	0
Common General	510,468,803	37,112,365	39,441,843	2,329,478
Common Total	895,835,758	82,056,768	84,386,246	2,329,478
Total PSCO Electric and Common	16,925,120,711	532,836,701	582,351,739	49,515,038

Each of these components has been analyzed, evaluated, and incorporated into the depreciation rates calculated in Exhibit No. XES – 201, Appendices A through A-3. Appendix D provides the proposed retirement dates for the Company's generating assets and Appendix F shows a comparison of the reserve reallocation within each function. Appendix G provides the terminal (dismantling cost) net salvage amounts by plant and unit and the source for those amounts. A more detailed discussion of net salvage for Production Plant can be found in Exhibit No. XES – 201, starting at page 94.

Q. WHY IS PSCO'S DEPRECIATION EXPENSE INCREASING?

A. The most significant change in depreciation expense, an increase of \$28.6 million, is related to Production Plant, and primarily to the \$18.8 million increase for Steam Production Plant. Changes in depreciation expense related to Production Plant include the average remaining life depreciation rates associated with the current terminal retirement dates, plant balances, reserve position, and the incorporation of new decommissioning cost estimates for all Production assets. Another factor that impacts depreciation expense is additional investment for Company assets since the existing depreciation rates were established. If the terminal retirement of a generating unit does not change between cases, any incremental investment added must be recovered over a shorter period.

Q. WHAT IS THE CHANGE IN DEPRECIATION EXPENSE FOR THE TRANSMISSION, DISTRIBUTION, ELECTRIC GENERAL, AND COMMON PLANT ACCOUNTS?

A. The increase in annual depreciation expense shown in Table LJW-D-3 shows increases for each function. The proposed lives for many accounts have lengthened as discussed above,

but the increase in annual depreciation expense is primarily due to changes in net salvage in the various accounts. The existing net salvage percentages, which were established in the 2016 Depreciation Study in Proceeding No. 16A-0231E, do not necessarily conform to current net salvage experience as discussed earlier and more fully in the Depreciation Rate Study (Exhibit No. XES – 201).

Q. IS THE ANNUAL DEPRECIATION EXPENSE CALCULATED FOR THE DEPRECIATION STUDY THE SAME IMPACT FOR THE TEST YEAR?

A. No, the Depreciation Study used plant balances as of December 31, 2020 to calculate the impact of the rates. The impact of the rates based on the plant balances for the test year ending December 31, 2022 are shown in the table below.

Depreciation Expense For the 12-Month

Period Ending 12/31/2022

Functional Class	Depreciation Expense
Steam Production	\$ 18,776,075
Hydro Production	\$ 5,261,002
Other Production	\$ 7,371,281
Transmission	\$ 5,559,273
Common	\$ 1,998,347
General & Intangible	\$ 7,018,439

1 **IV. CONCLUSION**

2 **Q. WHAT RECOMMENDATIONS ARE YOU MAKING?**

3 A. I recommend that the Commission:

- 4 • Accept PSCo’s proposed depreciation rates for transmission and general plant
5 reflected in Exhibit No. XES – 201, as supported by the Depreciation Rate Study and
6 Settlement Agreement, and authorize them to become effective for ratemaking and
7 financial accounting purposes on the same effective date the depreciation rates are
8 effective for the 2021 PSCo Colorado Retail Electric Rate Case; and
9 • Approve PSCo’s proposed revisions to Table 25 of Attachment O-PSCo that reflect
10 the revised transmission and general plant depreciation rates included in the
11 Settlement Agreement, effective on the same date.

12 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

13 A. Yes.

Public Service Company of Colorado

)
)
)

State of Minnesota)

) SS:

County of Anoka)


Laurie J. Wold

Public Service Company of Colorado submits this verification without a notary's attestation. The notarization requirement has been waived pursuant to Extension of Non-Statutory Deadlines, Supplemental Notice Waving Regulations in Docket No. AD20-11-000 (Dec. 8, 2021).

Exhibit No. XES - 201

Public Service Company of Colorado - Electric and
Common Utility Plant Depreciation Rate Study at
December 31, 2020, conducted by Alliance
Consulting Group, CoPUC Proceeding No.
21AL-0317E

PUBLIC SERVICE COMPANY OF COLORADO

ELECTRIC AND COMMON UTILITY PLANT DEPRECIATION RATE STUDY AT DECEMBER 31, 2020



<http://www.utilityalliance.com>

**PUBLIC SERVICE COMPANY OF COLORADO
ELECTRIC AND COMMON UTILITY PLANT
DEPRECIATION RATE STUDY
EXECUTIVE SUMMARY**

Public Service Company of Colorado (“PSCo” or “Company”) engaged Alliance Consulting Group to conduct a depreciation study of the Company’s Electric and Common utility plant depreciable assets using actual plant asset balances as of December 31, 2020. The total proposed increase in depreciation expense in this Study is \$49.5 million.

This Study uses the straight-line, broad (average) life group, remaining life depreciation system. In addition, this Study performs a reallocation of the accumulated reserve for depreciation. The net salvage analysis in this Study parallels the approach previously used in developing the depreciation rates adopted by the Colorado Public Utilities Commission (“Commission”) in PSCo’s electric rate case in Docket No. 19-0268E and Common are from Docket No. 17AL-0363G. For electric production plant, this Study uses the site-specific and generic decommissioning costs estimates developed in a 2020 Decommissioning Cost Study conducted by 1898 & CO. part of Burns & McDonnell Engineering Company, Inc. (“1898 & CO.”).

For Production accounts, the Company provided the current terminal retirement dates for generating units consistent with current expectations, environmental legislation, and resource plans. Terminal demolition costs were obtained from the 2020 Decommissioning Cost Study for all production facilities. Adopting the cost estimates reflected in the 2020 Decommissioning Cost Study less GSU and associated costs results in changes in depreciation rates related to the cost of removal for all production facilities. The changes in proposed depreciation expense in the production area are mainly due to the terminal retirement dates, additional investment in the generating units, the reallocation of reserve, updated dismantling estimates related to production plant facilities, and the correction of the historically under-accrued reserve position. The proposed increases in depreciation expense in electric production total \$28.6 million based on account balances as of December 31, 2020. The proposed increases in

depreciation expense by function within electric production are \$18.8 million, \$3.3 million, and \$9.8 million for Steam, Hydro, and Other production groups, respectively, as well as a proposed decrease of \$3.3 million for Wind Production. Appendix B demonstrates the change in depreciation expense for the various accounts based on projected plant balances as of December 31, 2020.

For Transmission, Distribution, General, and Common accounts, the lives of the accounts and net salvage parameters are reviewed in this Study. This Study recommends changes in depreciation for Transmission, Distribution, General, and Common accounts for each function based on account balances as of December 31, 2020 as follows: an increase of \$5.2 million for Transmission, an increase of \$6.6 million for Distribution, an increase of \$6.8 million for General, and an increase of \$2.3 million for Common General. For Electric Intangible Plant and Common Intangible Plant, there is no change in proposed expense. The total proposed change in depreciation expense for Transmission, Distribution, General, and Common is an increase of \$21.0 million based on account balances as of December 31, 2020.

For Transmission, Distribution, General, and Common accounts (excluding Intangibles), there are 10 accounts that have increasing lives and 16 accounts that have decreasing lives, while 26 accounts have no change. There is a trend toward slightly higher negative net salvage (where the cost of removal exceeds projected salvage value), with 16 accounts increasing their negative net salvage (*i.e.*, more negative or a simple decrease in net salvage), two accounts increasing their positive net salvage, and 34 having no change.

**PUBLIC SERVICE COMPANY OF COLORADO
DEPRECIATION RATE STUDY
AT DECEMBER 31, 2020**

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PURPOSE

The purpose of this study is to develop account depreciation rates for the depreciable Production, Transmission, Distribution, General, and Common Property as recorded on the books of Public Service Company of Colorado ("PSCo" or "Company") as of December 31, 2020. The depreciation rates were designed to recover the total remaining undepreciated investment, adjusted for net salvage, over the remaining life of PSCo's property on a straight-line basis. This Study includes the Company's depreciable electric and common plant assets. Non-depreciable property and property that is amortized, such as intangible software, are excluded from the analysis of this Study but are reported in the total plant and reserve data for a complete report of plant assets at the Study date.

The Study includes investment and reserves for the plant balances at December 31, 2020 for all Steam production units, Hydro production units, Other production units, and Wind production units, incorporating current retirement dates and dismantling costs for the Company's electric production assets. The depreciation rates were designed to recover the total remaining undepreciated investment, adjusted for net salvage, over the remaining life of PSCo's property on a straight-line basis.

PSCo is a regulated electric utility principally engaged in the generation, purchase, transmission, distribution, and sale of electricity in Colorado. PSCo provides the essential service of generating and delivering electricity safely, reliably, and economically to end-use consumers through its generation, transmission, and distribution systems.

STUDY RESULTS

Recommended depreciation rates for all PSCo depreciable property are shown in Appendix B. These rates translate into an annual depreciation accrual of \$248.6 million for Production, \$271.4 million for Transmission, Distribution, General, and Common Property plant, and \$62.4 million for General Intangible and Common Intangible plant. These accruals are based on PSCo's depreciable investment as of December 31, 2020, as shown in Appendix A. The annual depreciation expense calculated by the same method using the existing approved PSCo depreciation rates is \$220.1 million for Production, \$250.4 million for Transmission, Distribution, General, and Common plant, and \$62.4 million for Electric Intangible and Common Intangible plant. Appendix B shows the effect of the change in lives and curves on depreciation accrual by account. The proposed lives and curves on which these calculations are based are shown in Appendix C-1 and C-2. Appendix D shows the production unit retirement dates. Appendix E presents the net salvage analysis for all accounts. Appendix F presents a comparison between the proposed book reserve reallocation and the book reserve. Appendix G shows the allocation of dismantling costs and the computation of composite net salvage for generating unit and plant account.

GENERAL DISCUSSION

Definition

The term "depreciation" as used in this study is considered in the accounting sense; that is, a system of accounting that distributes the cost of assets, less net salvage (if any), over the estimated useful life of the assets in a systematic and rational manner. It is a process of allocation, not valuation. This expense is systematically allocated to accounting periods over the life of the properties. The amount allocated to any one accounting period does not necessarily represent the loss or decrease in value that will occur during that particular period. PSCo accrues depreciation on the basis of the original cost of all depreciable property included in each functional property group. At retirement, the full cost of depreciable property, less the net salvage value, is charged to the depreciation reserve.

Basis of Depreciation Estimates

Annual and accrued depreciation rates were calculated in this study by the straight-line, broad group, remaining-life depreciation system. In this system, the annual depreciation expense for each group is computed by dividing the original cost of the asset group less allocated depreciation reserve less estimated net salvage by its respective average remaining life. The resulting annual accrual amounts of all depreciable property within a function were accumulated and the total was divided by the original cost of all functional depreciable property to determine the depreciation rate. The calculated remaining lives and annual depreciation accrual rates were based on attained ages of plant in service and the estimated service life and salvage characteristics of each depreciable group, and were computed in a direct weighting by multiplying each vintage or account balance times its remaining life and dividing by the plant investment in service as of December 31, 2020. The computations of the annual account and functional depreciation rates, as well as the weighted remaining life calculations, are shown in Appendix A.

For production property specifically, annual, and accrued depreciation are calculated by the Straight-Line, Broad (Average Life) Group, Life Span (which

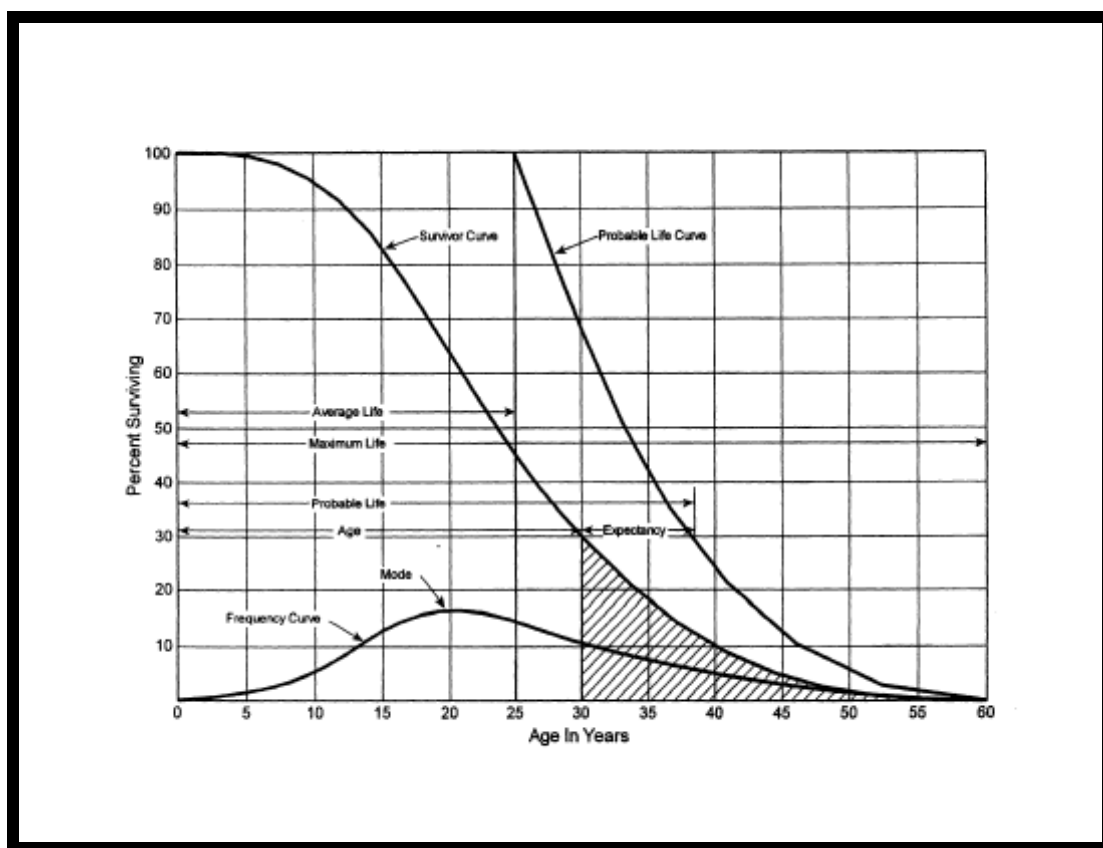
incorporates the Remaining Life technique) depreciation system. In this system, the depreciation accrual uses an allocation of the accumulated provision for depreciation based on each unit/account's theoretical depreciation reserve to determine the net investment needed to be recovered over each unit's remaining life, along with its estimated net salvage. The computations of accrual rates for production property are shown in Appendix A, and the allocation of the accumulated provision for depreciation is shown in Appendix F.

The Life Span estimation approach was incorporated into the analyses of PSCo production data. This method was used to develop the depreciation rates last approved by the Commission in the Company's electric rate case in Proceeding No. 19AL-0268E and 17AL-0363G and is generally used to determine depreciation rates for electric utility production property. This approach is more fully described in the next section.

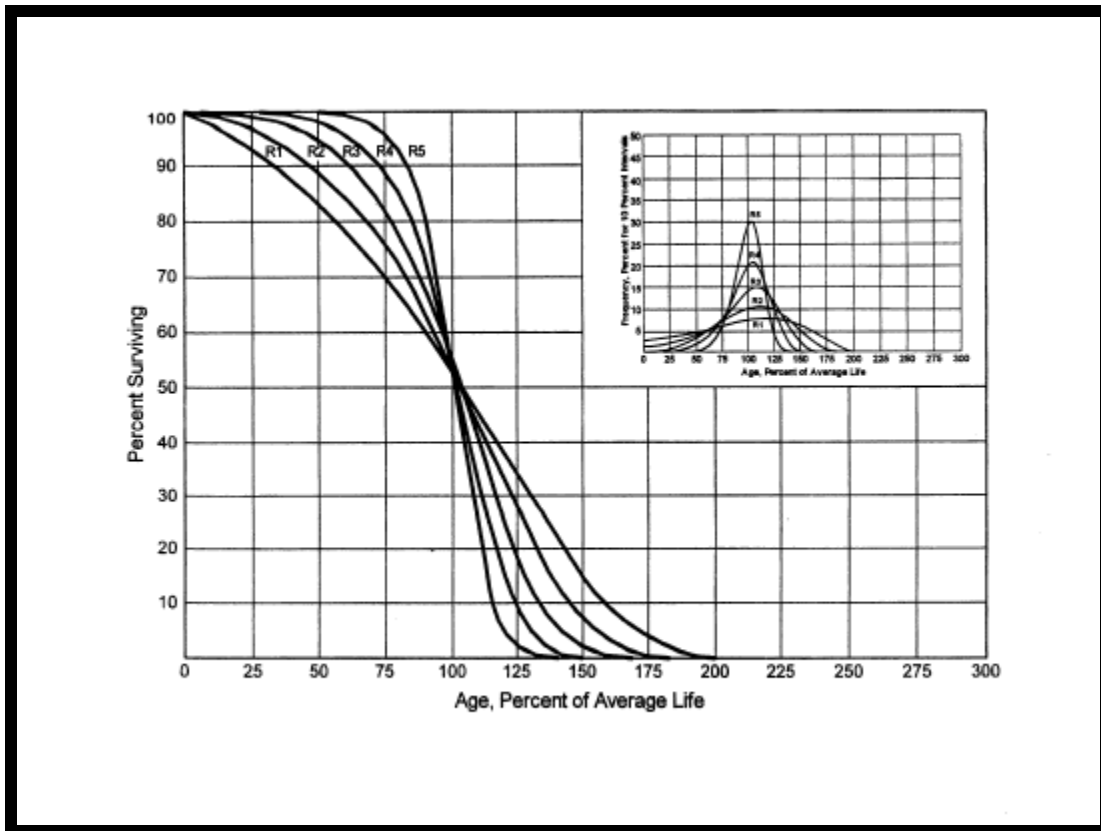
This Study utilizes Production interim retirement curves. Where sufficient vintaged information is available, actuarial analysis was performed for Transmission, Distribution, General, and Common Plant. For the accounts using actuarial analysis, placement and experience bands varied depending on the amount of data. Judgment is used to some degree on all accounts. Each approach used in this study is more fully described in a later section.

Survivor Curves

To fully understand depreciation projections in a regulated utility setting, there must be a basic understanding of survivor curves. Individual assets within a group do not normally have identical lives or investment amounts. The average life of a group can be determined by comparing actual experience against various survivor curves. A survivor curve represents the percentage of property remaining in service at various age intervals. The most widely used set of representative survivor curves are the Iowa Survivor Curves ("Iowa Curves"). The Iowa Curves are the result of an extensive investigation of life characteristics of physical property made at Iowa State College Engineering Experiment Station in the first half of the twentieth century. Through common usage, revalidation, and regulatory acceptance, these curves have become a descriptive standard for the life characteristics of industrial property. An example of an Iowa Curve is shown below.



There are four families in the Iowa Curves which are distinguished by the relation of the age at the retirement mode (largest annual retirement frequency) and the average life. The four families are designated as "R"—Right, "S"—Symmetric, "L"—Left, and "O"—Origin Modal. First, for patterns with the mode age greater than the average life, an "R" designation (*i.e.*, Right modal) is used. The family of "R" moded curves is shown below.



Second, an "S" designation (*i.e.*, Symmetric modal) is used for the family whose mode age is symmetric about the average life. Third, an "L" designation (*i.e.*, Left modal) is used for the family whose mode age is less than the average life. Fourth, a special case of left modal dispersion is the "O" or origin modal curve family. Within each curve family, numerical designations are used to describe the relative magnitude of the retirement frequencies at the mode. A "6" indicates that the retirements are not greatly dispersed from the mode (*i.e.*, high mode frequency) while a "1" indicates a large dispersion about the mode (*i.e.*, low mode frequency). For example, a curve with an average life of 30 years and an "L3" dispersion is a moderately dispersed, left modal curve that can be designated as a 30 L3 Curve. An SQ, or square, survivor curve occurs where no dispersion is present (*i.e.*, units of common age retire simultaneously).

For Production interim retirement curves, and Transmission, Distribution, and General Property accounts, a survivor curve pattern was selected based on analysis of historical data, as well as other factors, such as general changes relevant to PSCo's operations. The blending of judgment concerning current conditions and future trends, along with the matching of historical data, permits the depreciation analyst to make an informed selection of an account's average life and retirement dispersion pattern. Iowa Curves were used to depict the estimated survivor curves for each account.

Life Span Procedure

The life span procedure was used for production facilities for which most components are expected to have a retirement date concurrent with the planned retirement date of the generating unit. The terminal retirement date refers to the year that each unit will cease operations. The estimated terminal retirement dates for the various generating units were provided by PSCo based on determinations made by PSCo management, financial, and engineering staff. Those estimated terminal retirement dates are shown in Appendix D.

Interim Retirement Curves

Interim retirement curves were used to model the retirement of individual assets within primary plant accounts for each steam, hydro, other, and wind production generating unit prior to the terminal retirement of the facility. The life span procedure assumes all assets are depreciated (straight-line) for the same number of periods and retire at the same time (the terminal retirement date). Adding interim retirement curves to the procedure reflects the fact that some of the assets at a power plant will not survive to the end of the life of the facility and should be depreciated (straight-line) more quickly and retired earlier than the terminal life of the facility. The goal of interim retirement curves is to project how many of the assets that are currently in service will retire each year in the future using historical analysis and judgment. These curves were chosen based primarily on an analysis of the historical retirement pattern of the Steam, Hydro, Other, and Wind Production assets and consultation with PSCo personnel. Interim retirements for each plant account were modeled using Iowa Curves discussed above. By applying

interim retirements, recognition is given to the obvious fact that generating units will have retirements of depreciable property before the end of their lives.

Interim retirements are modeled by examining retirement activity by plant account from transaction years 1999-2020. Terminal retirement transactions, including retirements, gross salvage, and removal cost, are excluded from the analysis to arrive at the interim retirement transactions related to units continuing to operate. Averages are computed over that period for interim retirement rates and are used in analyzing production plant activity. Net salvage experienced for those assets over the same period is also analyzed. Interim net salvage for those retirements occurring prior to a plant's terminal retirement date is modeled prospectively.

Although interim retirements have been recognized in the study, interim additions (*i.e.*, future additions) have been excluded from the study. The estimated amount of future additions might or might not occur. However, there is no uncertainty as to whether the full level of interim retirements will happen. The assets that are being modeled for retirement are already in rate base. Steam, Hydro, Other, and Wind Production depreciation rates using interim retirements are known and measurable in the same way that setting depreciation rates for transmission or distribution property using Iowa Curves is known and measurable. There is no depreciable asset that is expected to live forever. All assets at a power plant will retire at some point. Interim retirements simply model when those retirements will occur in the same way that is done for transmission or distribution assets. The inclusion of an interim retirement component for Production Plant is consistent with the prior studies.

Actuarial Analysis

Actuarial analysis (retirement rate method) was used in evaluating historical asset retirement experience where vintage data were available and sufficient retirement activity was present. In actuarial analysis, interval exposures (total property subject to retirement at the beginning of the age interval, regardless of vintage) and age interval retirements are calculated. The complement of the ratio of interval retirements to interval exposures establishes a survivor ratio. The survivor ratio is the fraction of property surviving to the end of the selected age interval, given that it has survived to the beginning of that age

interval. Survivor ratios for all of the available age intervals were chained by successive multiplications to establish a series of survivor factors, collectively known as an observed life table. The observed life table shows the experienced mortality characteristic of the account and may be compared to standard mortality curves such as the Iowa Curves. Many accounts were analyzed using this method. Placement bands were used to illustrate the composite history over a specific era, and experience bands were used to focus on retirement history for all vintages during a set period. Matching data in observed life tables for each experience and placement band to an Iowa Curve requires visual examination. As stated in Depreciation Systems by Wolf and Fitch, “the analyst must decide which points or sections of the curve should be given the most weight. Points at the end of the curve are often based on fewer exposures and may be given less weight than those points based on larger samples” (page 46). Some analysts chose to use mathematical fitting as a tool to narrow the population of curves using a least squares technique. Use of the least squares approach does not imply a statistical validity, however, because the underlying data does not meet criteria for independence between vintages and the same average price for property units through time. Thus, Depreciation Systems cautions, “... the results of mathematical fitting should be checked visually, and the final determination of best fit made by the analyst” (page 48). This study uses the visual matching approach to match Iowa Curves, since mathematical fitting produces only theoretically possible curve matches. Visual examination and experienced judgment allow the depreciation professional to make the final determination as to the best curve type.

Detailed information for each account is shown later in this study and in workpapers.

Judgment

Any depreciation study requires informed judgment by the analyst conducting the study. A knowledge of the property being studied, company policies and procedures, general trends in technology and industry practice, and a sound basis of understanding depreciation theory are needed to apply this informed judgment. In this depreciation study, judgment was used in areas such as survivor curve modeling and selection, depreciation method selection, and actuarial analysis.

Where there are multiple factors, activities, actions, property characteristics, statistical inconsistencies, property mix in accounts or a multitude of other considerations that affect the analysis (potentially in various directions), judgment is used to take all of these considerations and synthesize them into a general direction or understanding of the characteristics of the property. Individually, no one consideration in these cases may have a substantial impact on the analysis, but overall, the collective effect of these considerations may shed light on the use and characteristics of assets. Judgment may also be defined as deduction, inference, wisdom, common sense, or the ability to make sensible decisions. There is no single correct result from statistical analysis; hence, there is no answer absent judgment.

Theoretical Depreciation Reserve

The book accumulated provision for depreciation within each function was allocated among Production, Transmission, Distribution, and General Property Plant accounts through the use of the theoretical depreciation reserve model. This study used a reserve model that relied on a prospective concept relating future retirement and accrual patterns for property, given current life and salvage estimates.

The theoretical reserve of a property group is developed from the estimated remaining life of the group, the total life of the group, and estimated net salvage. The theoretical reserve represents the portion of the group cost that would have been accrued if current forecasts were used throughout the life of the group for future depreciation accruals. The computation involves multiplying the vintage balances within the group by the theoretical reserve ratio for each vintage. The straight-line remaining-life theoretical reserve ratio (RR) at any given age is calculated as:

$$RR = 1 - \frac{(\text{Average Remaining Life})}{(\text{Average Service Life})} * (1 - \text{Net Salvage Ratio})$$

DETAILED DISCUSSION

Depreciation Study Process

This depreciation study encompassed four distinct phases. The first phase involved data collection and field interviews. The second phase was where the initial data analysis occurred. The third phase was where the information and analysis was evaluated. After the first three stages were complete, the fourth phase began. This phase involved the calculation of deprecation rates and documentation of the corresponding recommendations.

During the Phase 1 data collection process, historical data was compiled from continuing property records and general ledger systems. Data was validated for accuracy by extracting and comparing to multiple financial system sources: Projects System (Construction ledger), Fixed Asset System (continuing property ledger), General Ledger, and interfaces from other operating systems. Audit of this data was validated against historical data from prior periods, historical general ledger sources, and field personnel discussions. This data was reviewed extensively so that it could be put in the proper format for a depreciation study. Further discussion on data review and adjustment is found in the Salvage Consideration section of this study. Also, as part of the Phase 1 data collection process, numerous discussions were conducted with engineers and field operations personnel to obtain information that would be helpful in formulating life and salvage recommendations in this study. One of the most important elements in performing a proper depreciation study is to understand how a company utilizes assets and the environment of those assets. Understanding industry and geographical norms for mortality characteristics are important factors in selecting life and salvage recommendations; however, care must be used not to apply them rigorously to any particular company since no two companies would have the same exact forces of retirement acting upon their assets. Interviews with engineering and operations personnel are important ways to allow the analyst to obtain information that is helpful when evaluating the output from the life and net salvage programs in relation to a company's actual asset utilization and environment. Information that was gleaned in these discussions with PSCo personnel for this study is found both in the Detailed

Discussion portions of the Life Analysis and Salvage Analysis sections and also in workpapers. In addition, Alliance personnel possess a significant understanding of the types of electric utility property, the forces of retirement due to years of day-to-day exposures, and operations of electric utility property.

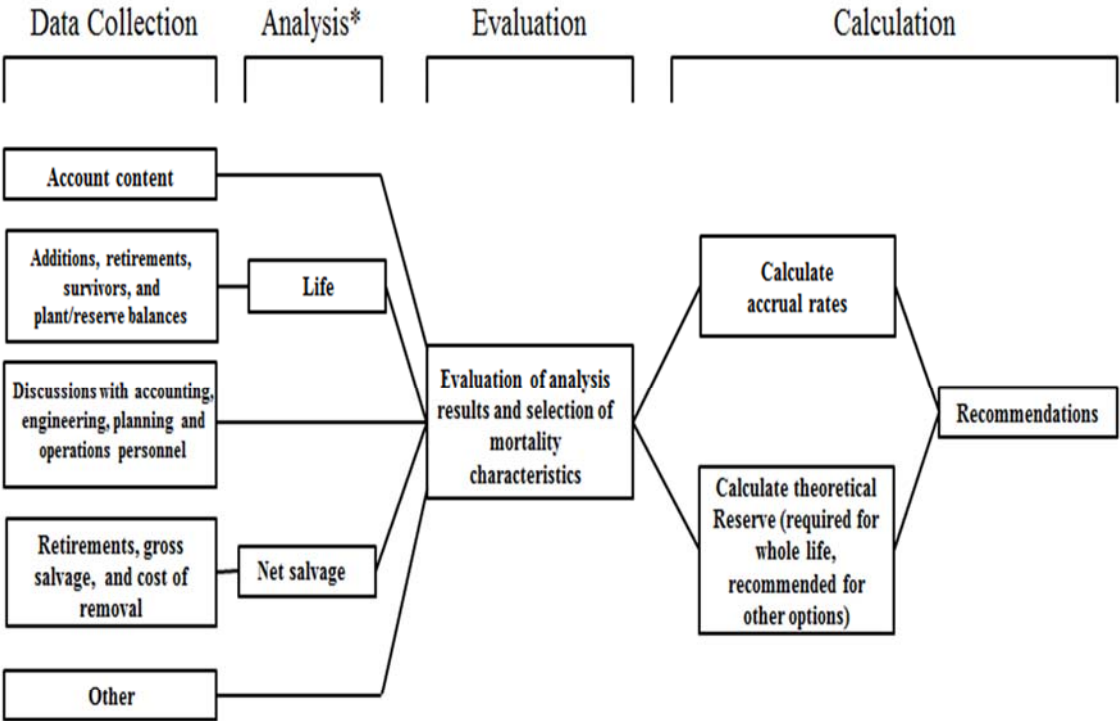
Phase 2 is where the actuarial analysis are performed. Phase 2 and Phase 3 (to be discussed in the next paragraph) overlap to a significant degree. The detailed property records information is used in Phase 2 to develop observed life tables for life analysis. It is possible that an analyst would cycle back to this phase based on the evaluation process performed in Phase 3. Net salvage analysis consists of compiling historical salvage and removal data by functional group and account to determine values and trends in gross salvage and removal cost. This information is then carried forward into Phase 3 for the evaluation process.

Phase 3 is the evaluation process, which synthesizes analysis, interviews, and operational characteristics into a final selection of asset lives and net salvage parameters. The historical analysis from Phase 2 is further enhanced by the incorporation of recent or future changes in the characteristics or operations of assets that were revealed in Phase 1. The preliminary results are then reviewed by the depreciation analyst and discussed with accounting and operations personnel. Phases 2 and 3 allow a depreciation analyst to validate the asset characteristics as seen in the accounting transactions with actual company operational experience.

Finally, Phase 4 involves the calculation of accrual rates, making recommendations and documenting the conclusions in a final report. The calculation of accrual rates for this study is found in Appendix A. Recommendations for the various accounts are contained within the Detailed Discussion of this report. The depreciation study flow diagram shown as Figure 1¹ documents the steps used in conducting this study. Depreciation Systems on page 289 documents the same basic processes in performing a depreciation study.

¹ Introduction to Depreciation for Public Utilities and Other Industries, AGA EEI, 2013.

Book Depreciation Study Flow Diagram



Source: Introduction to Depreciation for
Public Utilities and Other Industries, AGA
EEI, 2013.

*Although not specifically noted, the mathematical
analysis may need some level of input from other
sources (for example, to determine analysis bands for
life and adjustments to data used in all analysis).

PSCO Depreciation Study Process

Production Depreciation Calculation Process

Annual depreciation expense amounts for the Steam, Hydro, Other and Production accounts were calculated by the straight line, remaining life procedure. In a whole life representation, the annual accrual rate is computed by the following equation,

$$\text{Annual Accrual Rate} = \frac{(100\% - \text{Net Salvage Percent})}{\text{Average Service Life}}$$

In the case of production facilities with a terminal life and interim retirement curve, each vintage within the group has a unique average service life and remaining life determined by computing the area under the truncated Iowa Curve coupled with the group's terminal life. Use of the remaining life depreciation system adds a self-correcting mechanism, which accounts for any differences between theoretical and book depreciation reserve over the remaining life of the group. For production assets, the remaining life for each account is derived from the remaining life of the generating unit. With the straight line, remaining life, average life group system, composite remaining lives were calculated by computing a direct weighted average of each remaining life by vintage within the group. Within each group, for each plant account and generating unit, the difference between the surviving investment, adjusted for estimated future net salvage, and the allocated book depreciation reserve, was divided by the composite remaining life to yield the annual depreciation expense as noted in this equation.

$$\text{Annual Depreciation Expense} = \frac{\text{Original Cost} - \text{Book Reserve} - (\text{Original Cost} * \text{Net Salvage \%})}{\text{Remaining Life}}$$

Within a group, the sum of the group annual depreciation expense amounts, as a percentage of the depreciable original cost investment summed, gives the annual depreciation rate as shown below:

$$\text{Annual Depreciation Rate} = \frac{\sum \text{Annual Depreciation Expense}}{\sum \text{Original Cost}}$$

These calculations are shown in Appendix A. The calculations of the theoretical depreciation reserve values and the corresponding remaining life calculations are shown in the workpapers. Book depreciation reserves are maintained on a plant account and generating unit level basis. Theoretical reserve computations were used to reallocate depreciation reserves by account and to compute remaining life for each group.

Transmission, Distribution, and General Calculation Process

Annual depreciation expense amounts for Transmission, Distribution, and General and Common Property Accounts 389 - Land Rights and 390 - Structures and Improvements were calculated by the straight line, average life group, remaining life procedure.

In a whole life representation, the annual accrual rate is computed by the following equation,

$$\text{Annual Accrual Rate} = \frac{(100\% - \text{Net Salvage Percent})}{\text{Average Service Life}}$$

Use of the remaining life depreciation system adds a self-correcting mechanism, which accounts for any differences between theoretical and book depreciation reserve over the remaining life of the group. With the straight line, remaining life, average life group system using Iowa Curves, composite remaining lives were calculated according to standard broad group expectancy techniques, noted in the formula below:

$$\text{Composite Remaining Life} = \frac{(\sum \text{Original Cost} - \text{Theoretical Reserve})}{\sum \text{Whole Life Annual Accrual}}$$

For each plant account, the difference between the surviving investment, adjusted for estimated future net salvage, and the allocated book depreciation reserve, was divided

by the composite remaining life to yield the annual depreciation expense as noted in this equation.

$$\text{Annual Depreciation Expense} = \frac{\text{Original Cost} - \text{Book Reserve} - (\text{Original Cost} * \text{Net Salvage \%})}{\text{Composite Remaining Life}}$$

Within a group, the sum of the group annual depreciation expense amounts, as a percentage of the depreciable original cost investment summed, gives the annual depreciation rate as shown below:

$$\text{Annual Depreciation Rate} = \frac{\sum \text{Annual Depreciation Expense}}{\sum \text{Original Cost}}$$

These calculations are shown in Appendix A. The calculations of the theoretical depreciation reserve values and the corresponding remaining life calculations are shown in the workpapers for this study. Book depreciation reserves are maintained on a plant account level basis. Theoretical reserve computations were used to reallocate depreciation reserves by account and to compute remaining life for each account.

Vintage Group Amortization

PSCo uses vintage group amortization for assets in Accounts 391-398. Under vintage group amortization, assets in Accounts 391-398 will be retired when they reach the average service life of the group. PSCo has reviewed the life and net salvage parameters for all accounts in this group. In the life analysis and salvage analysis sections, recommended changes to each account describe the depreciation parameters requested for those accounts. The amortization accrual for General and Common Property plant will change to reflect the reserve position of the various accounts and small changes in life parameters and net salvage percentages. This allows PSCo to continue to track small dollar General Property plant items in a cost-efficient manner. The amortization accrual calculations for vintage group amortization are reflected in Appendix A-1 and Appendix A-2.

The changes in General and Common Property plant for Vintage Group Amortization assets resulted in a reserve difference that has to be addressed to provide full recovery of the cost for these assets. The remaining lives for many of these accounts are less than five years, which would create a large spike in depreciation accrual rates to recover any reserve deficiency. For those reasons, a 10-year recovery period for the General and Common Property plant reserve deficiency is recommended in this study.

LIFE ANALYSIS

PRODUCTION PLANT

STEAM PRODUCTION, FERC ACCOUNTS 311-316

HYDRAULIC PRODUCTION, FERC ACCOUNTS 331-336

OTHER PRODUCTION, FERC ACCOUNTS 341-346

WIND PRODUCTION, FERC ACCOUNTS 341-346

For each type of production plant listed above, an interim retirement analysis was conducted. PSCo has five Fossil Steam Production generating sites included in this study: Cherokee, Comanche, Craig Hayden, and Pawnee. Hydraulic Production generation sites include Ames, Cabin Creek, Georgetown, Salida, Shoshone, and Tacoma. Other Production generation sites include Alamosa, Blue Spruce, Cherokee, Fort St Vrain, Fruita, Ft. Lupton, Rocky Mountain, Valmont, and Wind to Hydrogen. Wind Production generation sites include Cheyenne Ridge and Rush Creek.

Terminal Retirement Date

The terminal retirement date refers to the year in which a generating unit will be retired from service. The retirement can be for a number of reasons such as the physical end of the generating unit but will generally be driven by economic retirement of the unit. PSCo personnel provided their estimated retirement dates for each generating unit. These dates are based on the current plans and investment in the generating units. Retirement dates for generating units can be found in Appendix D. As new investment is committed to these units or decisions made that units are not economically viable, these retirement dates may change. At this time, these retirement dates are the best estimate of the current lives remaining in the generating assets.

Interim Retirement Curve

Historical data used to develop interim retirement curves that represent an aggregate of many property units in a group. Some of those assets may be long lived, and others may have a short life. The average of those is represented by an interim retirement curve for the group. A group can be a plant account or a functional group. The interim retirement curve is “truncated” (*i.e.*, cut off) at the age the unit will retire. In other

words, if one finds through the analysis that 10 percent of the property in an account will be retired and replaced prior to the end of the life of the unit, the interim retirement curve will model those retirements across the rest of the life of the unit. If a pump is going to last only 10 years but the unit is projected to last 20 years, the shorter life of the pump should affect the depreciation expense charged over the next 10 years. When analyzing a large pool of assets like power plant accounts, these shorter-lived items can be accurately modeled together statistically. Thus, given that interim retirements will occur, this statistical analysis enables one to measure the interim retirement curves applicable to property groups.

Some examples of “long lived” property that are projected to last until the retirement of a unit are: roads, bridges, railroad track, intake/discharge structures, structural steel (and misc. steel), cooling towers, buildings, cranes, dams, ponds, basins, canals, foundations, stacking and reclaiming equipment, surge silos, crushers, transfer towers, fly ash and bottom ash systems, precipitators, bag houses, stack, turbine (except blades) and piping, generator cooling system, vacuum systems, generator and main leads, station transformers, conduits and ducts, station grounding system, start-up diesel generators, and stores equipment.

Some examples of “shorter lived” property that are projected to retire prior to the retirement of the unit are: fences, signs, sprinkler systems, security systems, Intake screens, roofs, cooling fan units, air compressors, fuel oil heaters, heating, ventilation and air conditioners, piping, motors, pumps, conveyors, pulverizers, air preheaters, economizers, control equipment, feedwater heaters, boiler feedwater pumps, forced draft (FD) and induced draft (ID) fans, scrubbers, continuous emissions monitoring systems (CEM), turbine blades and buckets, turbine plant instruments, condensers, control equipment, station service switchgear, and universal power supply (UPS) batteries.

A further discussion of the selection of interim retirement curves for the production accounts follows in the Detailed Discussion section.

Interim Retirement Curve Life Analysis

Historical data (where sufficient data exists) for all units was combined by account to analyze historic activity and develop proposed interim retirement curves. This

combined experience across various generating units was used as a representation of PSCo's retirement history for its production units to model future retirement activity. Proposed interim retirement lives and dispersion curves to reflect the recognition that some assets at each plant will retire prior to the end of the life of the unit were analyzed at an account level for all generating assets within each account.

The prior study utilized interim retirement ratios. After discussion with the Company, it was decided to change from interim retirement ratios to the use of an Iowa Curve to model interim retirement activity. Alliance Consulting Group recommends the use of Iowa Curves, which are used much more widely across the utility industry and more accurately represent the retirement pattern for the units over time. In addition, the Company's other operating companies use interim retirement curves to model interim activity. One weakness of interim retirement ratios is that they do not incorporate the age of individual vintages and how that pattern may change depending on the life cycle of a generating unit.

The life analysis performed for interim retirement activity removes all terminal retirement activity and includes only interim retirement transactions related to units continuing to operate.

Depreciation Study Assumptions

After discussion with the Company, the Company made specific requests to incorporate in the study's scope. These requests impact various functions. Each functional group will be reallocated with certain exceptions specified by the Company. The following items impact the Generation assets:

- Production retirement dates remain the same as the settlement in 2016.
- Interim Retirements lives and curves used to calculate interim retirements.
- Terminal Retirements will be identified and excluded from data in the interim retirement analysis.
- Comanche Common will be separated into two components: retiring with Units 1 & 2 and Unit 3.
- No reallocation of Comanche, Craig Unit 1, Rush Creek or Cheyenne Ridge reserves.
- Separate Wind Production from Other Production.
- Valmont 6 and Valmont 7 & 8 should be studied separately.

- 1898 & CO. Decommissioning study without GSU used for the estimate of terminal net salvage with the exception of expenditures for Ponnequin which are actuals.

The Company requested that certain assets that will go into service after December 31, 2020 be included in the depreciation study:

- Proforma Community Solar Gardens and Manchief are in the study scope.
- Manchief Other Production plant should be allocated like Blue Spruce.

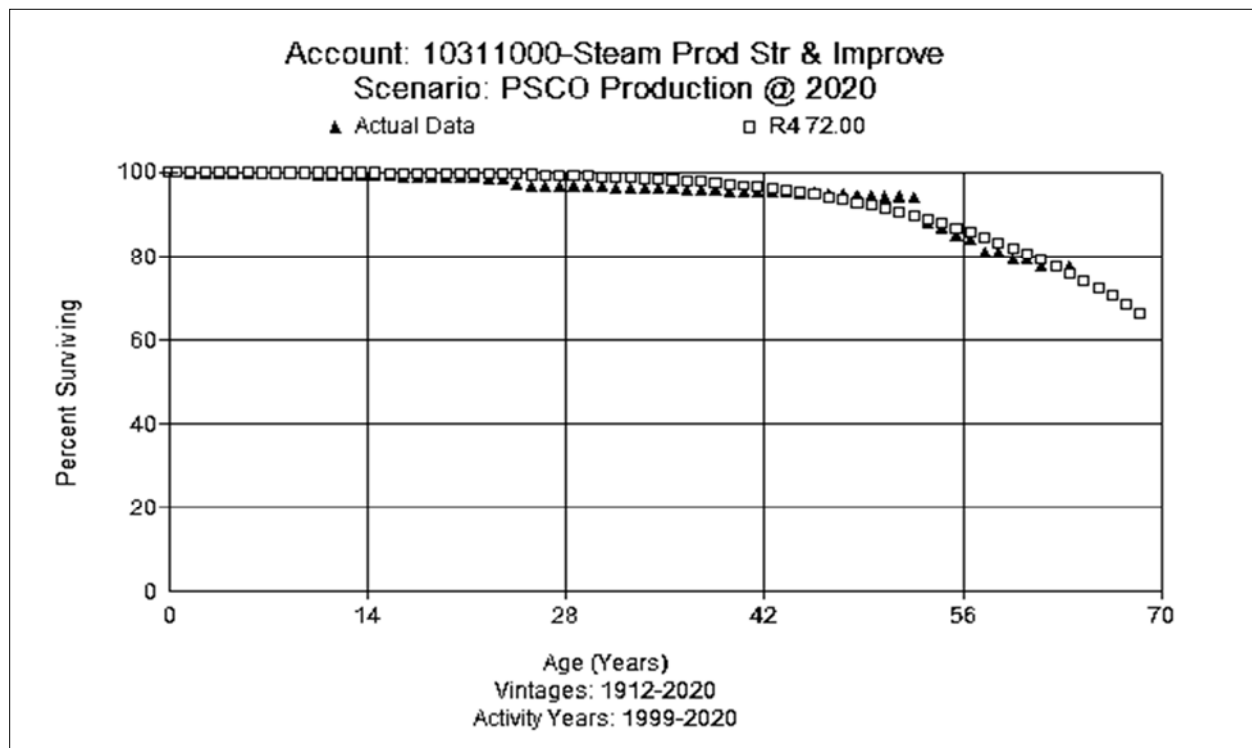
The Company gave the following instructions that impact the Transmission, Distribution, and General functions:

- Do not change lives or net salvage parameters for groups 370 and 370.2. Those accounts contain the assets that are going to be retired and the undepreciated balances be transferred to a regulatory asset recommended by Company witness Ms. Wold.
- Develop life estimates, net salvage rates, and depreciation accrual rates for Account 363 Energy Storage Equipment, Account 370.02 Meters-AGIS-AMI Equipment and 371.40 Installations on Customer's Premises- EV. Account 397 has various sub-accounts which will be combined into one for the depreciation study.
- Leasehold plant will not be included in the depreciation study and will be amortized over term of the lease.

STEAM PRODUCTION

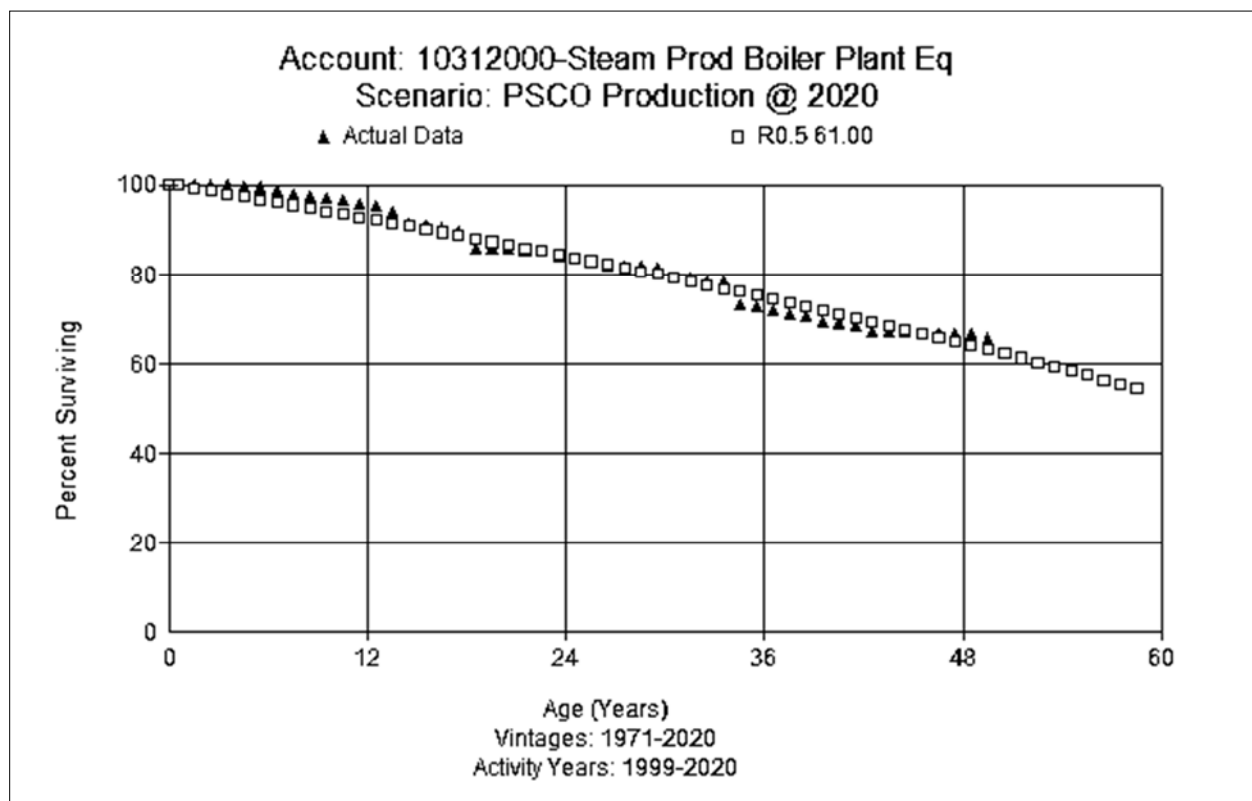
FERC Account 311.0 Structures and Improvements (72 R4)

This account consists of buildings, structures, fences, lighting systems, and other related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. After reviewing visual matches of various curves across the bands analyzed and considering the types of assets in this account, this study recommends a 72 R4 dispersion curve for interim retirements, which is shown below.



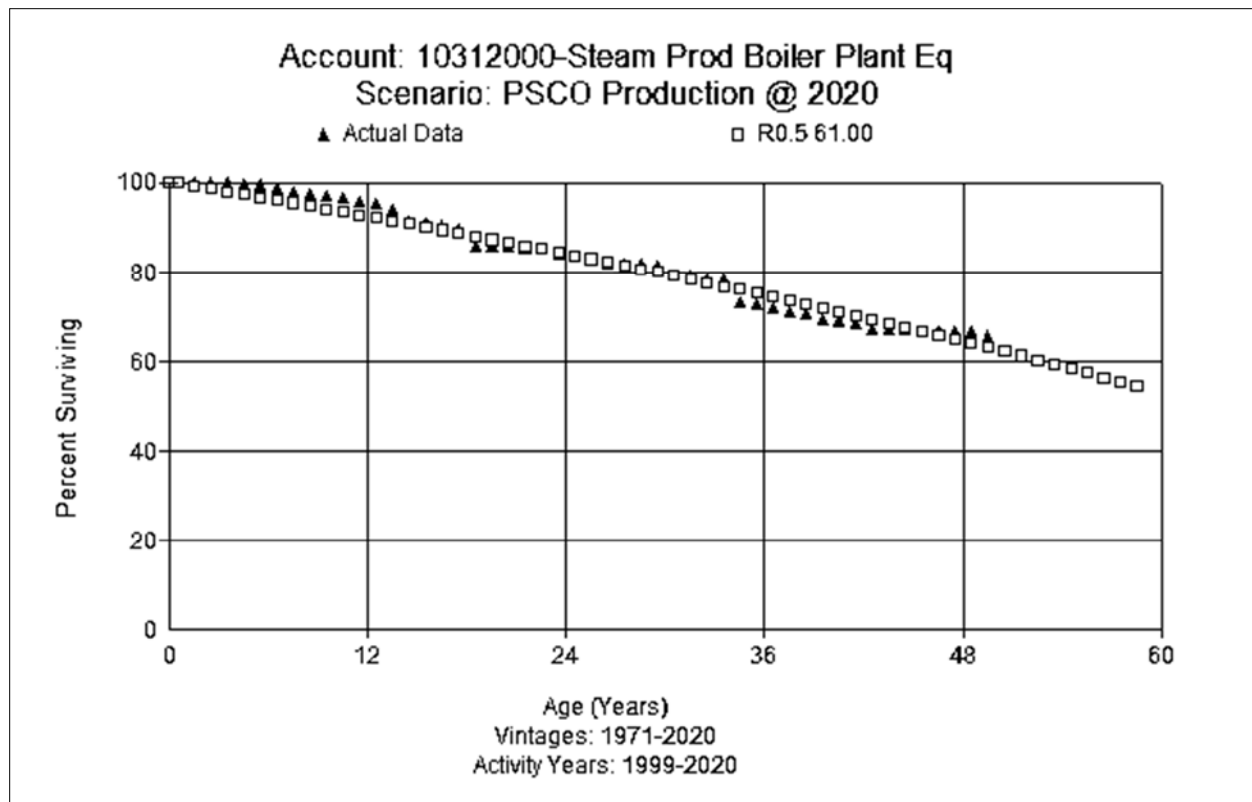
FERC Account 312.0 Boiler Plant Equipment (61 R0.5)

This account consists of boiler plant equipment, bag houses, preheaters, and other related equipment. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. Discussions with Company personnel indicated that they believe that the turbogenerators account would have a longer average interim retirement life than the boiler plant. Company personnel indicated that 69 years for turbogenerators is reasonable. After reviewing visual matches of various curves across the bands analyzed and considering the types of assets in this account, this study recommends a 61 R0.5 dispersion curve for interim retirements, which is shown below.



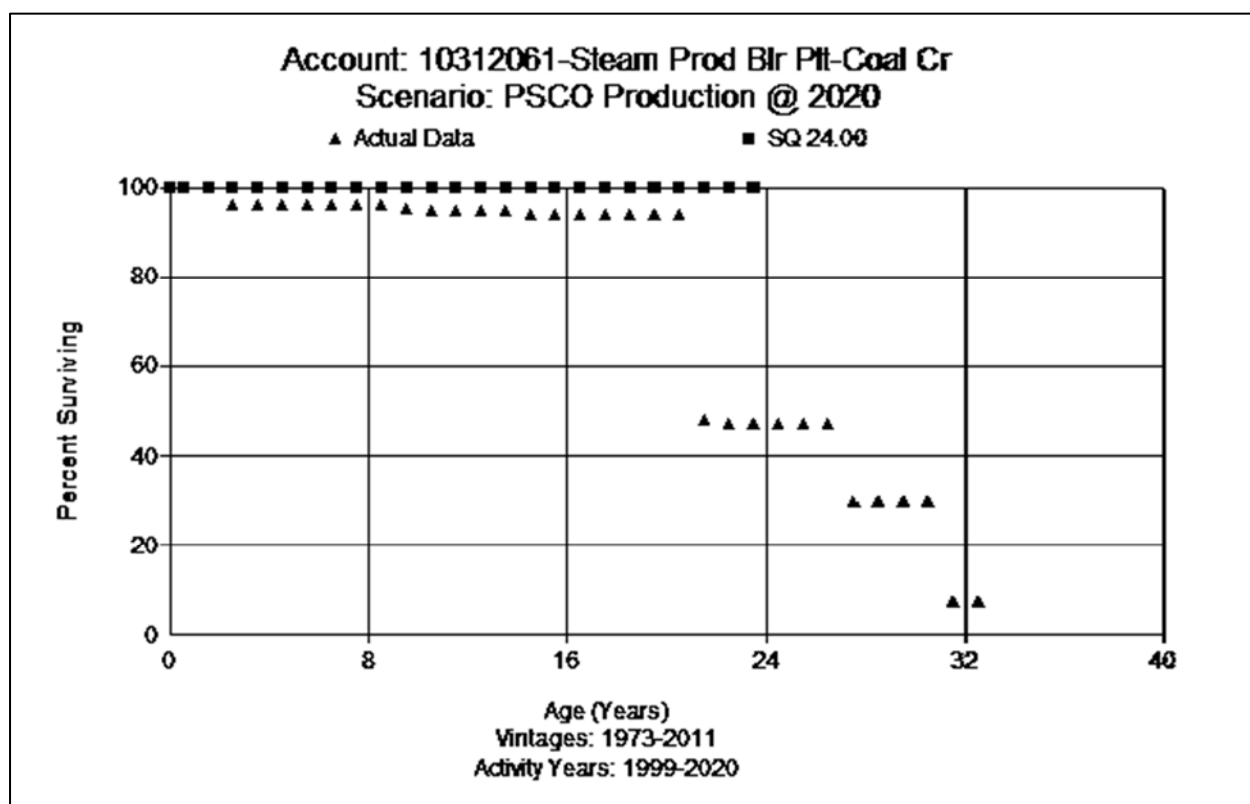
FERC Account 312.0 Boiler Plant Equipment AQIR (61 R0.5)

This account consists of air quality control systems and other related equipment. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. Discussions with Company personnel indicated that they are only 10 years into new air quality systems. The equipment is mostly passive, such as steel, and therefore is expected to have a similar life as Account 312. This study recommends the same 61 R0.5 dispersion curve for interim retirements shown below.



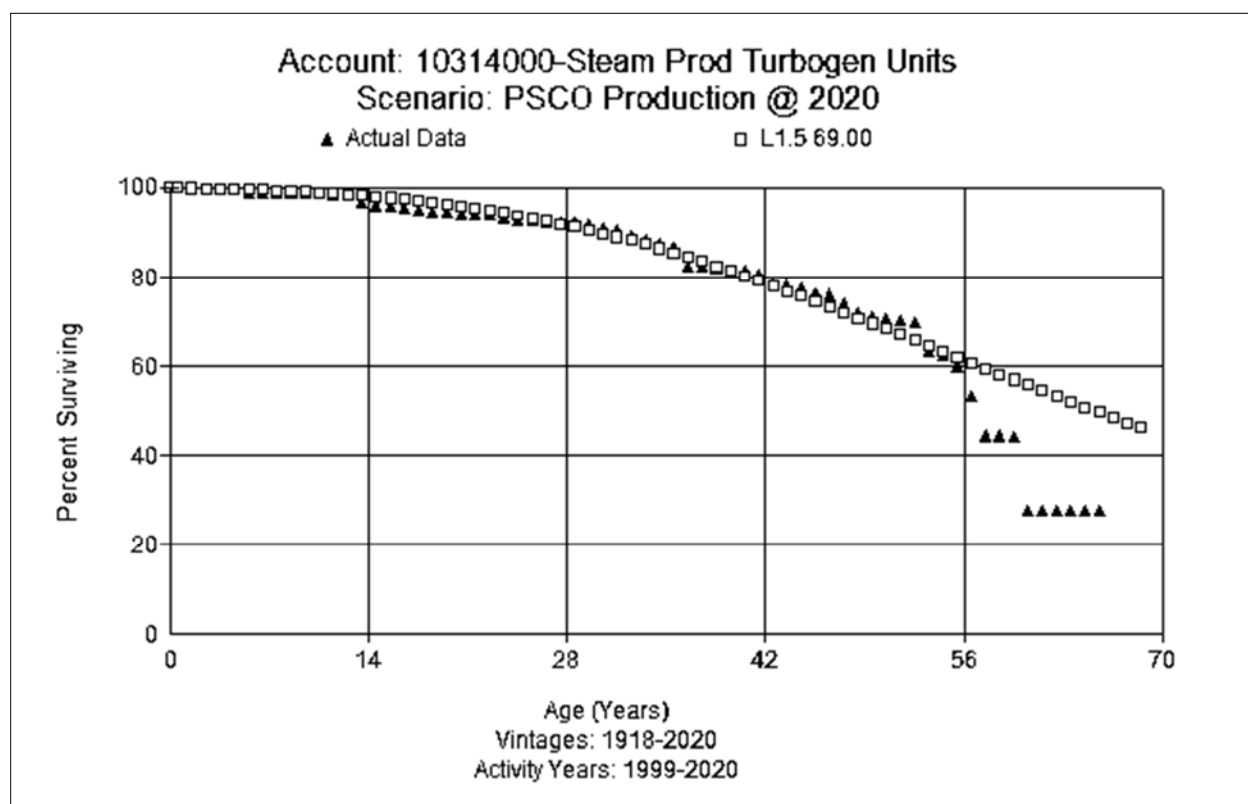
FERC Account 312.2 Coal Cars (24 SQ)

This account includes the cost of coal cars used in producing electricity. There is approximately \$20.0 million in this account as of December 31, 2020. Based on judgment and the type of assets in this account, this Study recommends a 24-year life and the SQ dispersion. A graph of the observed life table versus the proposed 24-year life is shown below.



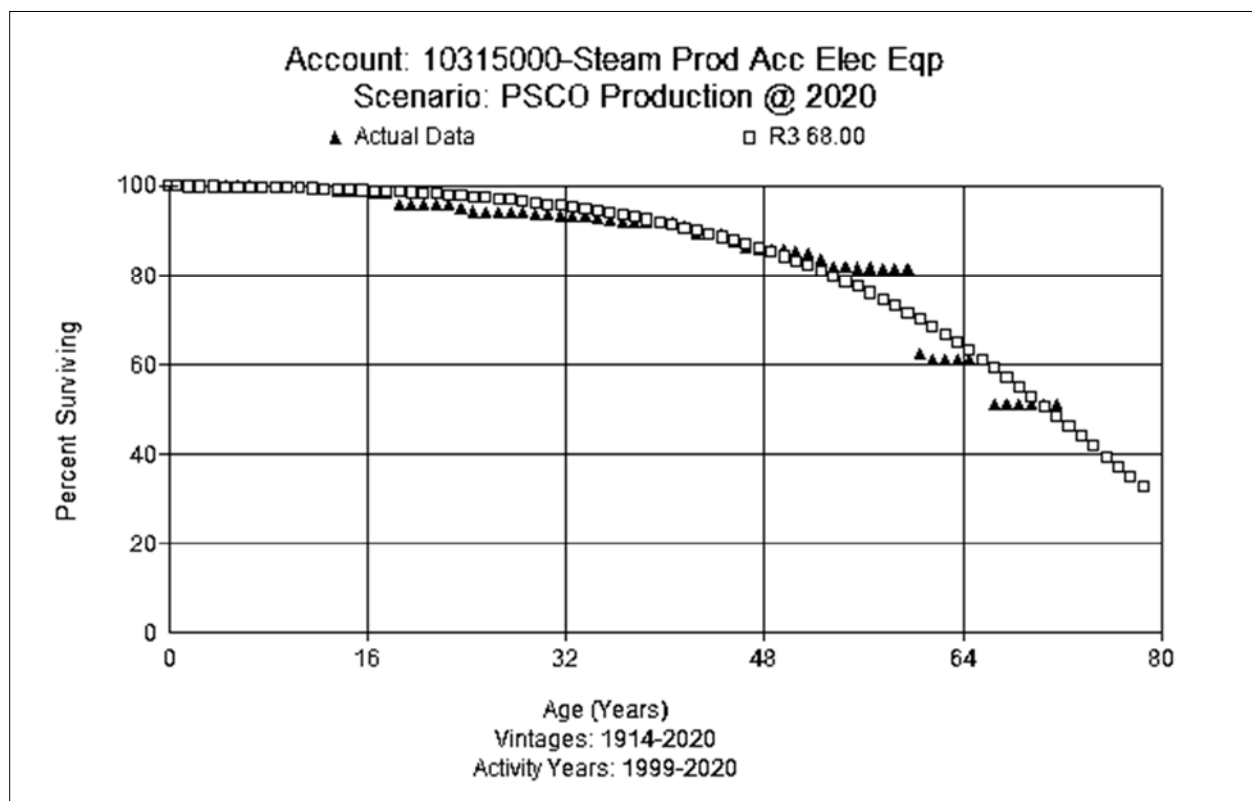
FERC Account 314.0 Turbogenerator Equipment (69 L1.5)

This account consists of turbogenerator equipment, stationary blades, turbine control systems, and other related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. Discussions with Company personnel indicated they believe that the turbogenerators would have a longer average interim retirement life than the boiler plant. They believe 69 years for turbogenerators is reasonable. After reviewing visual matches of various curves across the bands analyzed, considering the types of assets in this account, and discussions with Company personnel, this study recommends a 69 L1.5 dispersion curve for interim retirements, which is shown below.



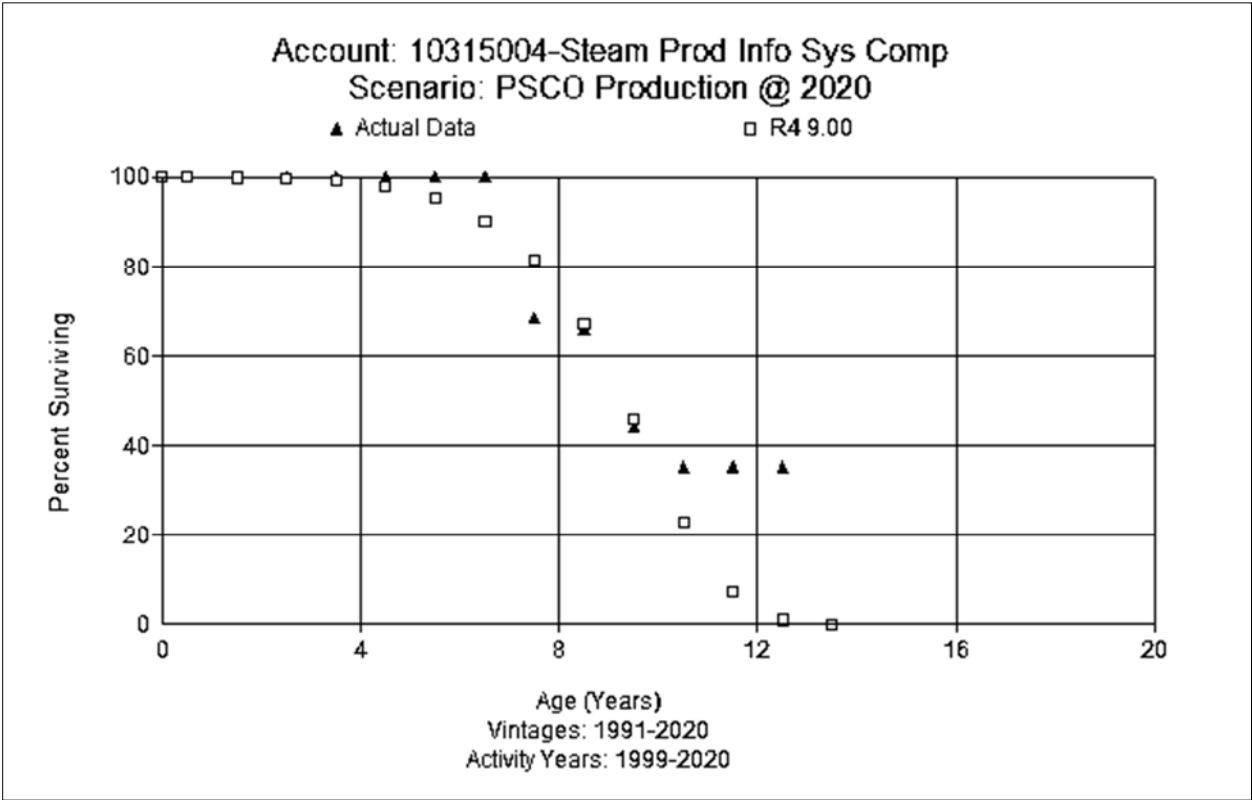
FERC Account 315.0 Accessory Electric Equipment (68 R3)

This account consists of power transformer, regulators, and related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. Discussions with Company personnel indicated they believe the replacement timeframe is on the lower end of what is shown in the historical analysis. There are issues with finding OEM parts and also the full component may fail and need to be replaced while in some other accounts, parts can be replaced. Mostly, these are non-moving parts and a 60+ year life in general is not unreasonable. After reviewing visual matches of various curves across the bands analyzed and considering the types of assets in this account, this study recommends a 68 R3 dispersion curve for interim retirements, which is shown below.



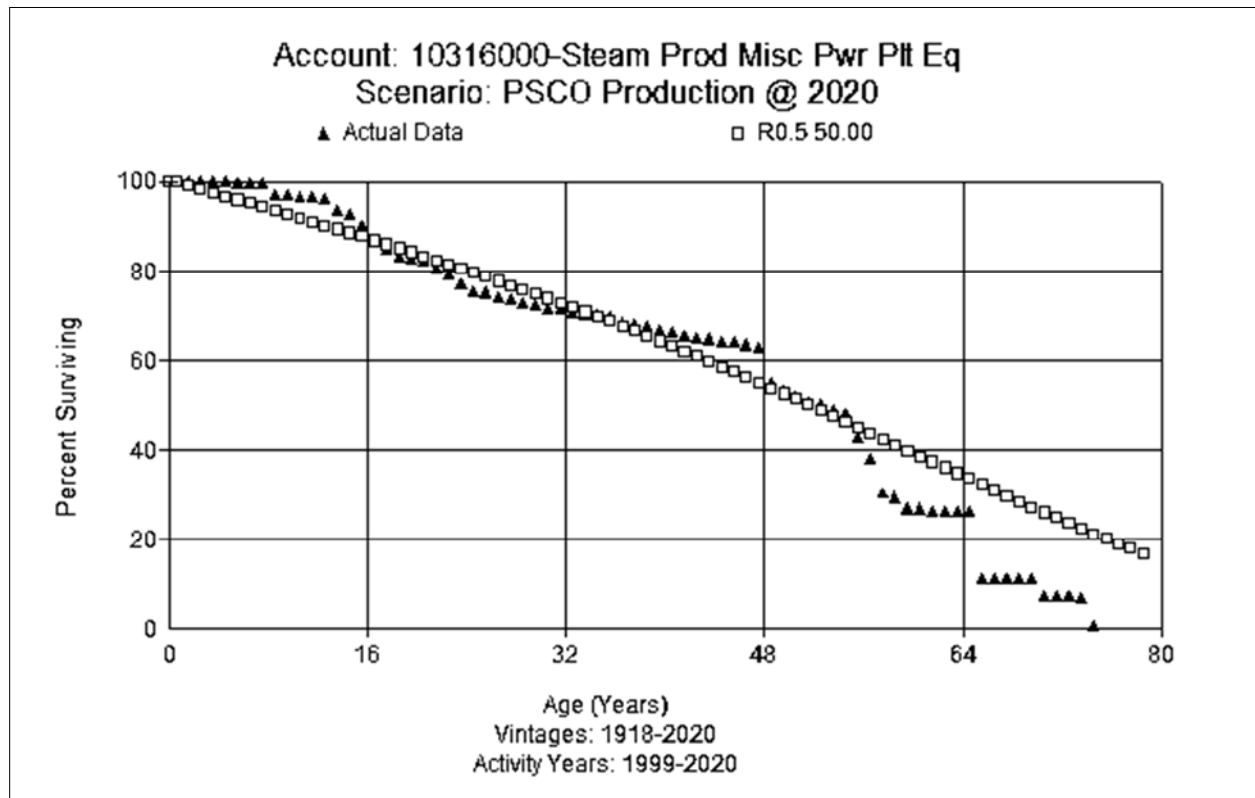
FERC Account 315.2 Computers and Peripherals (9 R4)

This account consists of computers, peripherals, and station control related assets at each plant. Retirement dates for each unit are found in Appendix D. After reviewing visual matches of various curves across the bands analyzed and considering the types of assets in this account, this study recommends a 9 R4 dispersion curve for interim retirements, which is shown below.



FERC Accounts 316.0 Miscellaneous Power Plant Equipment (50 R0.5)

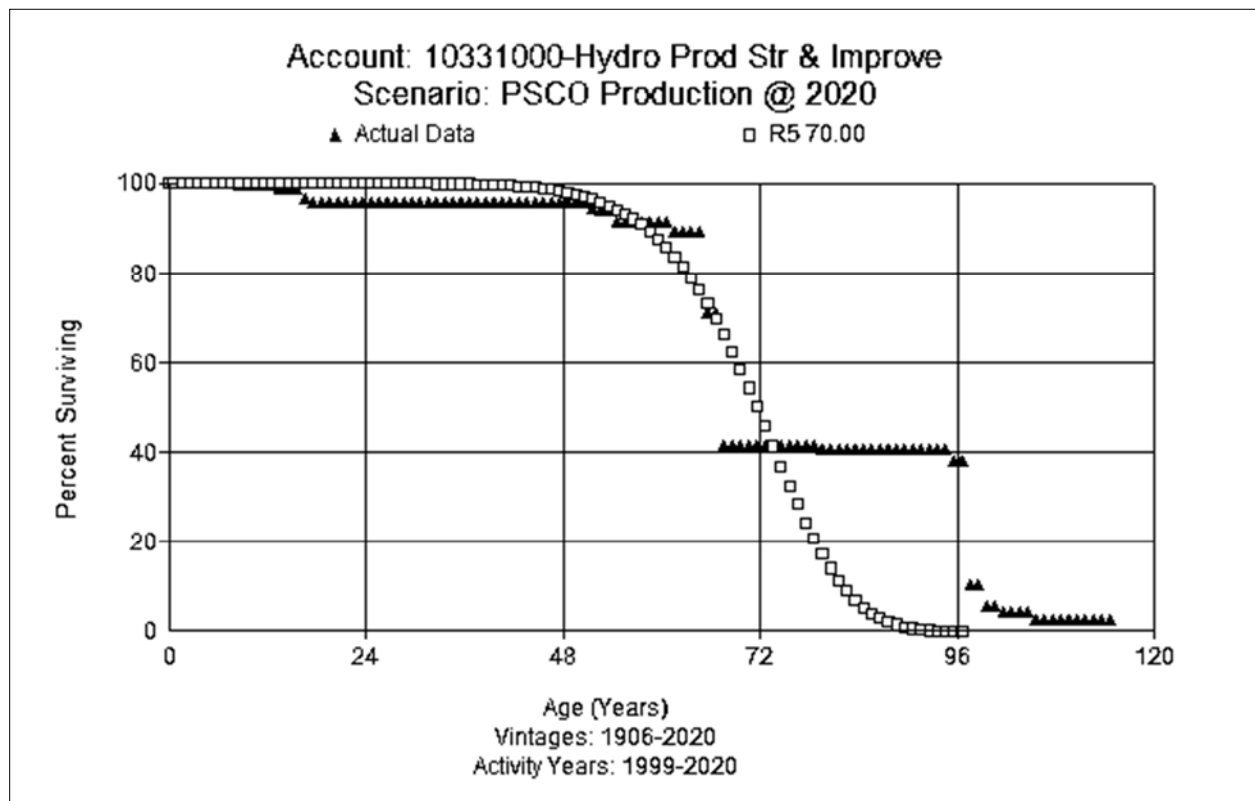
This account consists of tanks, pumps, work equipment, and other related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. After reviewing visual matches of various curves across the bands analyzed and considering the types of assets in this account, this study recommends a 50 R0.5 dispersion curve for interim retirements, which is shown below.



HYDRAULIC (HYDRO) PRODUCTION

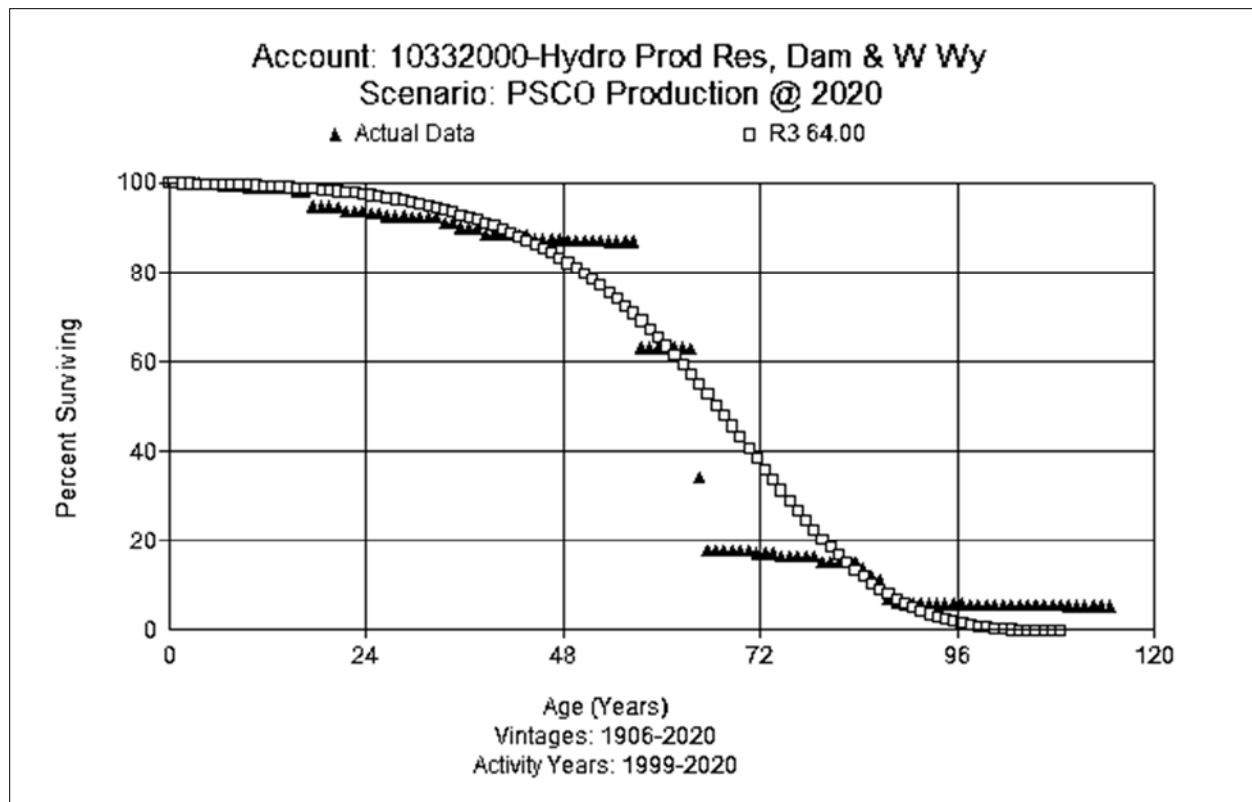
FERC Account 331.0 Structures and Improvements (70 R5)

This account consists of buildings, structures, fences, lighting systems, and other related assets at each plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. After reviewing visual matches of various curves across the bands analyzed and considering the types of assets in this account, this study recommends a 70 R5 dispersion curve for interim retirements, which is shown below.



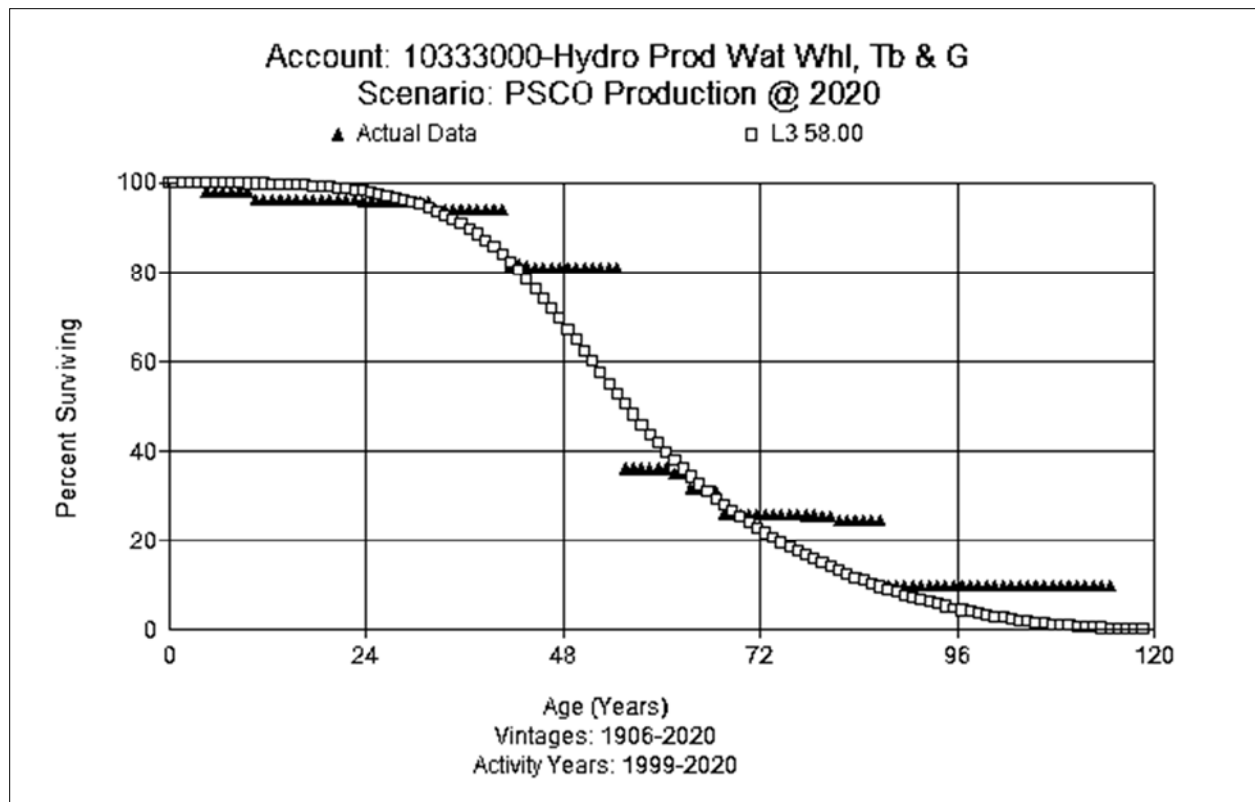
FERC Account 332.0 Reservoirs, Dams and Waterways (64 R3)

This account consists of dams, penstocks, spillways, hoists, foundations, intakes, and other related equipment. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. After reviewing visual matches of various curves across the bands analyzed and considering the types of assets in this account, this study recommends a 64 R3 dispersion curve for interim retirements, which is shown below.



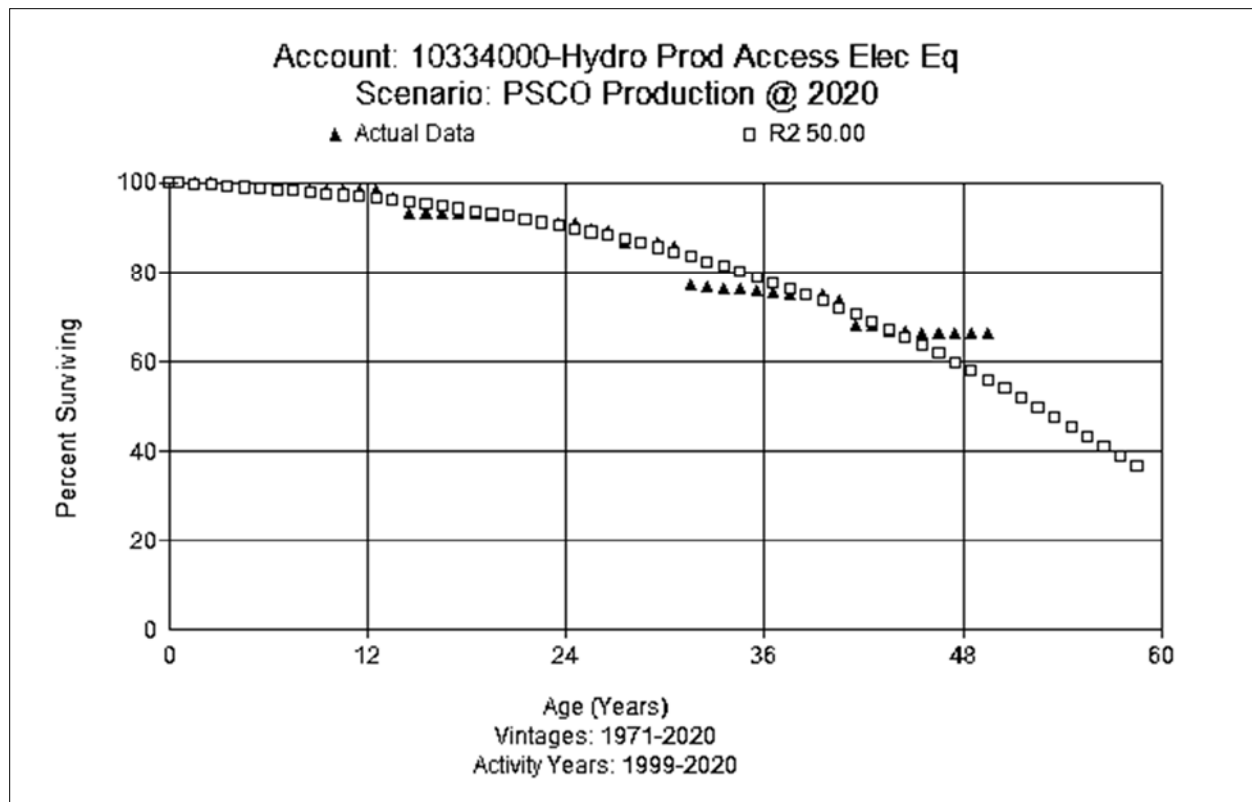
FERC Account 333.0 Waterwheels, Turbines and Generators (58 L3)

This account consists of pumps, generators, turbines, valves, and other related assets at each plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. After reviewing visual matches of various curves across the bands analyzed, considering the types of assets in this account, and discussions with Company personnel, this study recommends a 58 L3 dispersion curve for interim retirements, which is shown below.



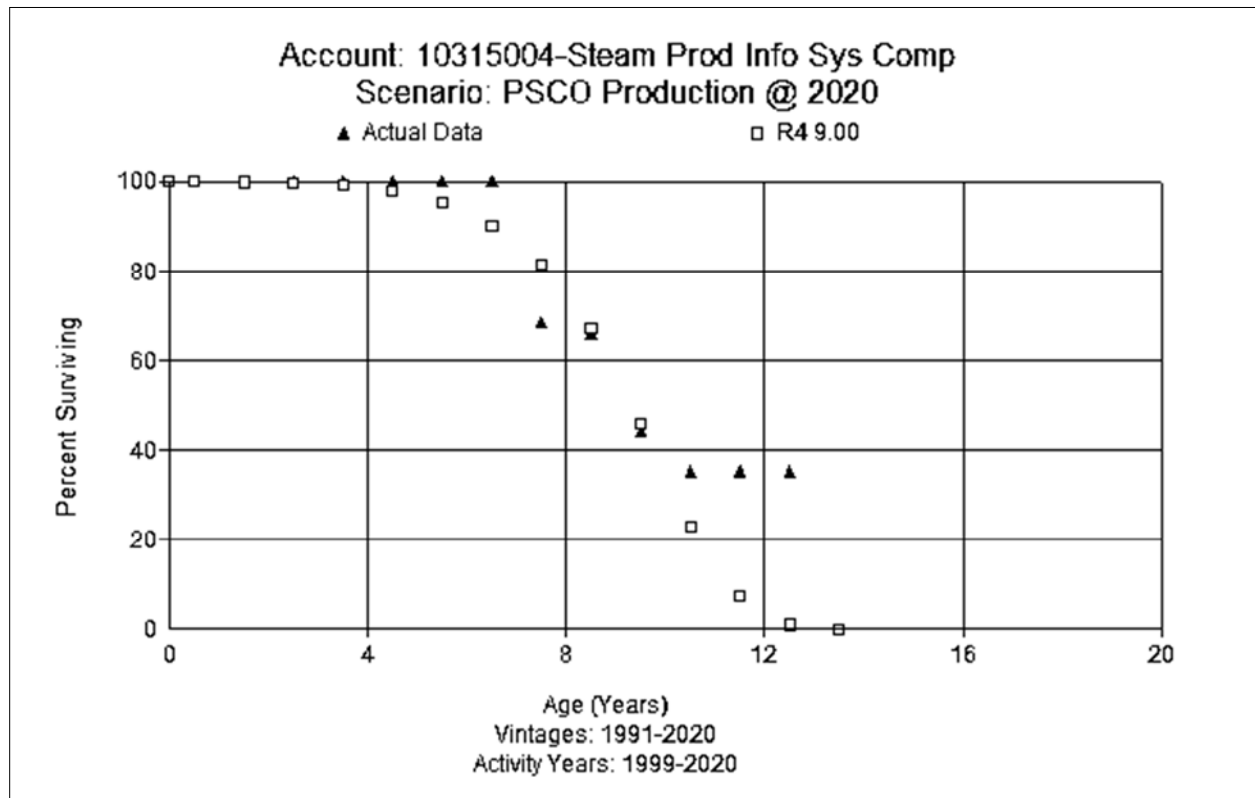
FERC Account 334.0 Accessory Electric Equipment (50 R2)

This account consists of generators, control systems, exciter, pumps, turbines, valves, and related assets at each plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. After reviewing visual matches of various curves across the bands analyzed and considering the types of assets in this account, this study recommends a 50 R2 dispersion curve for interim retirements, which is shown below.



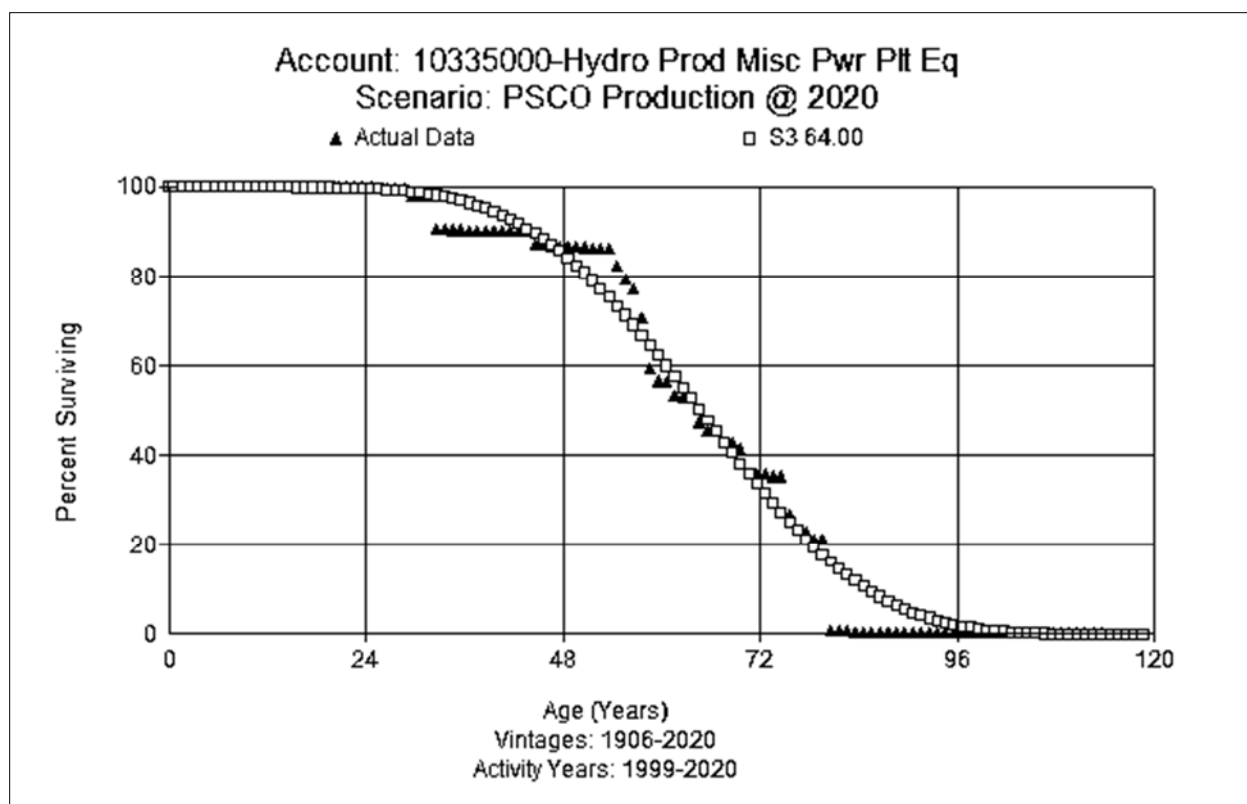
FERC Account 334.2 Computers and Peripherals (9 R4)

This account consists of computers, peripherals, and station control related assets at each plant. Retirement dates for each unit are found in Appendix D. Due to the similarity of assets, the same analysis used for Steam Account 315.2 is being recommended here. The study recommended 9 R4 dispersion curve for interim retirements is shown below.



FERC Accounts 335.0 Miscellaneous Power Plant Equipment (64 S3)

This account consists of station controls, pumps, work equipment, and other related assets at each plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. After reviewing visual matches of various curves across the bands analyzed and considering the types of assets in this account, this study recommends a 64 S3 dispersion curve for interim retirements, which is shown below.

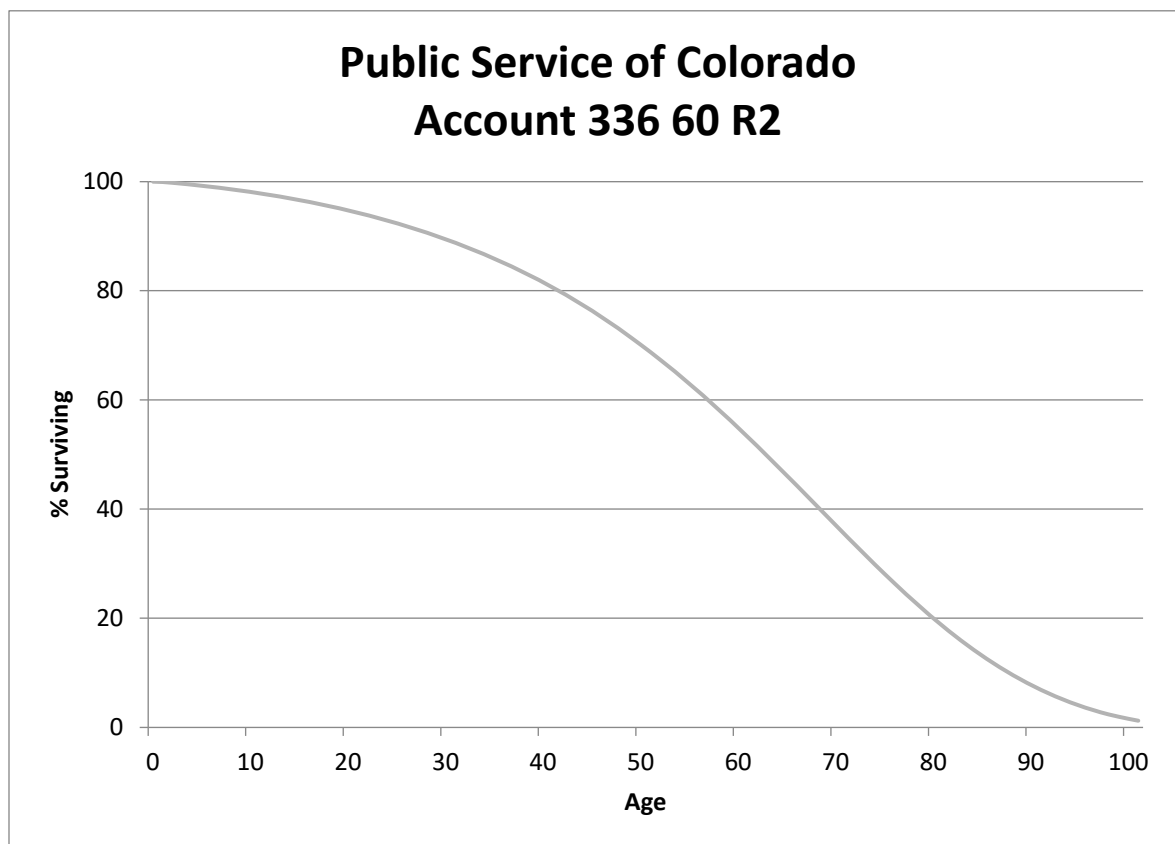


FERC Accounts 335.2 Recreational Facilities (60 R2)

This account consists of yard improvements at each plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. There was insufficient activity for analysis. Based on the types of assets in this account, this study recommends a 60 R2 dispersion curve for interim retirements. A representative curve shape is shown in Account 336 below.

FERC Accounts 336.0 Miscellaneous Power Plant Equipment (60 R2)

This account consists of bridges, road, and yard improvements at each plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. There was insufficient activity for analysis. Based on the types of assets in this account, this study recommends a 60 R2 dispersion curve for interim retirements. A representative curve shape is shown below.



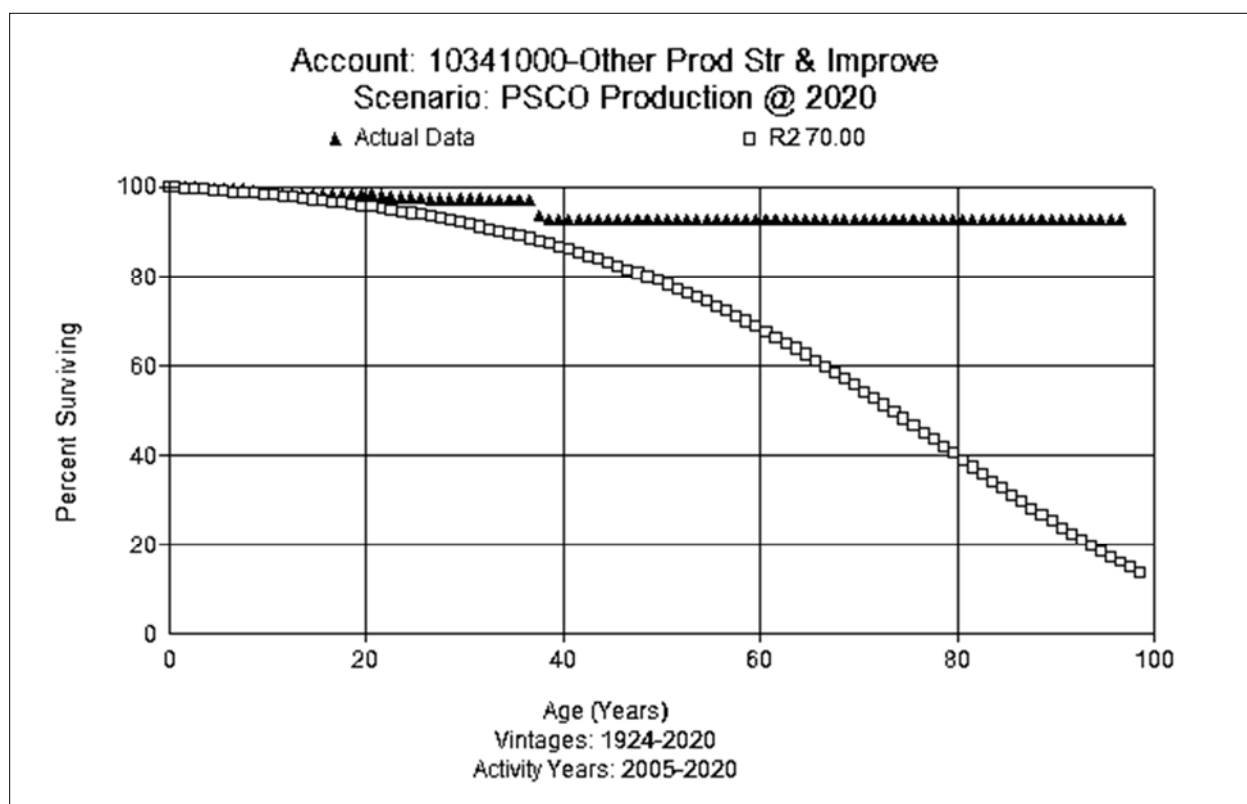
OTHER PRODUCTION

Interim Retirement Curve

Historical data for all units was combined by account for accounts 341-346 to analyze historic activity and develop proposed interim retirement curves. This combined experience across various generating units was used as a representation of PSCo's retirement history for other production to model future retirement activity. Proposed interim retirement lives and dispersion curves, chosen to reflect the recognition that some assets at each plant will retire prior to the end of the life of the unit, were analyzed at an account level for all generating assets within each account.

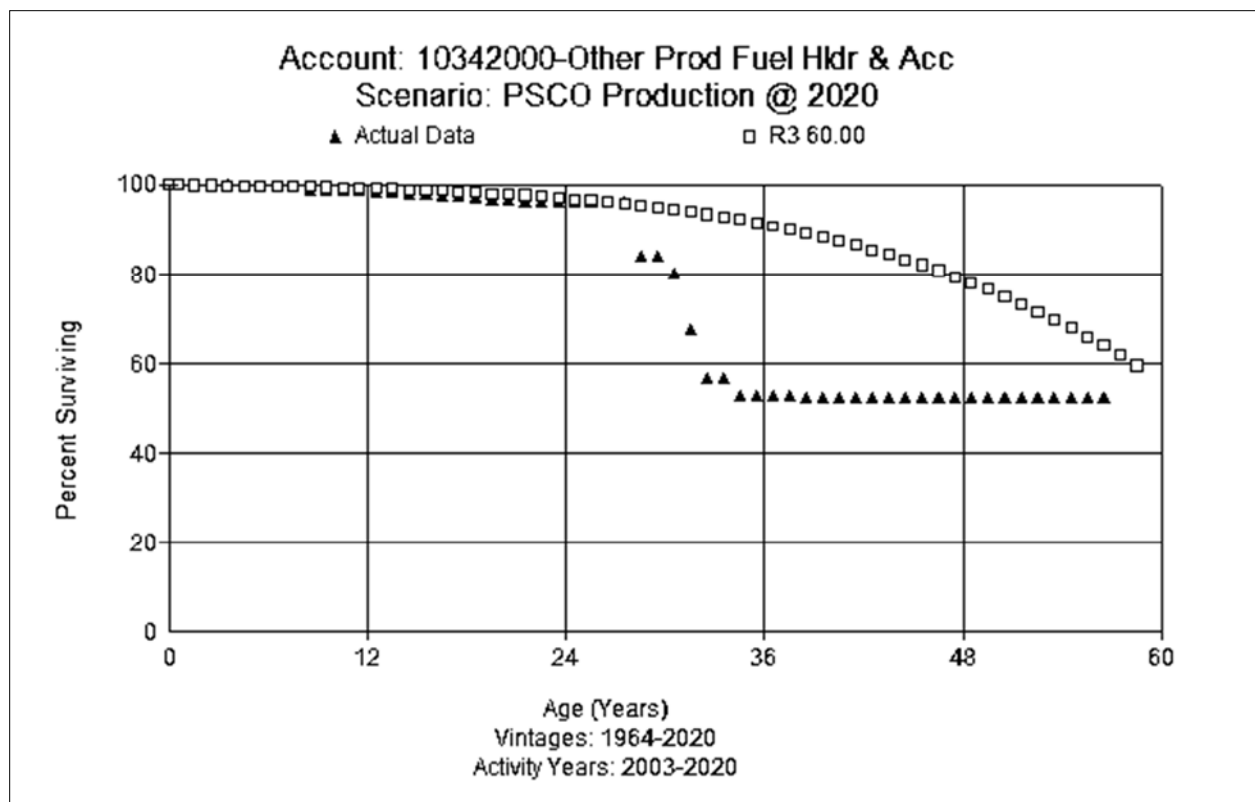
FERC Account 341.0 Structures and Improvements (70 R2)

This account consists of buildings, structures, fences, lighting systems, and other related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. There is little activity on which to base a life selection. After reviewing visual matches of various curves across the bands analyzed, considering the types of assets in this account, and judgment, this study recommends a 70 R2 dispersion curve for interim retirements, which is shown below.



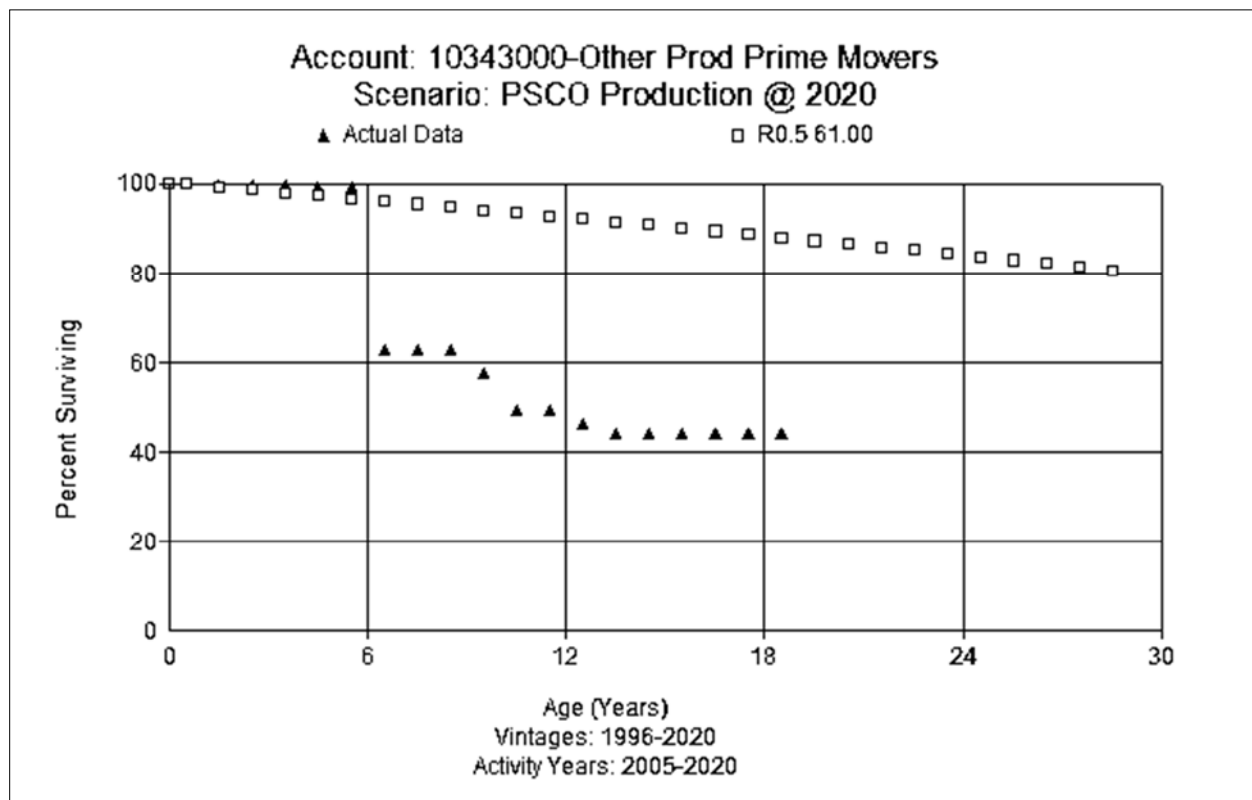
FERC Account 342.0 Fuel Holders and Accessory Equipment (60 R3)

This account consists of auxiliary boilers, feedwater systems, pumps, storage tanks, natural gas/fuel oil piping, and other related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. All bands show a life that is lower than normally experienced for interim retirements in this account. Based on judgment, this study recommends a 60 R3 dispersion curve for interim retirements, which is shown below.



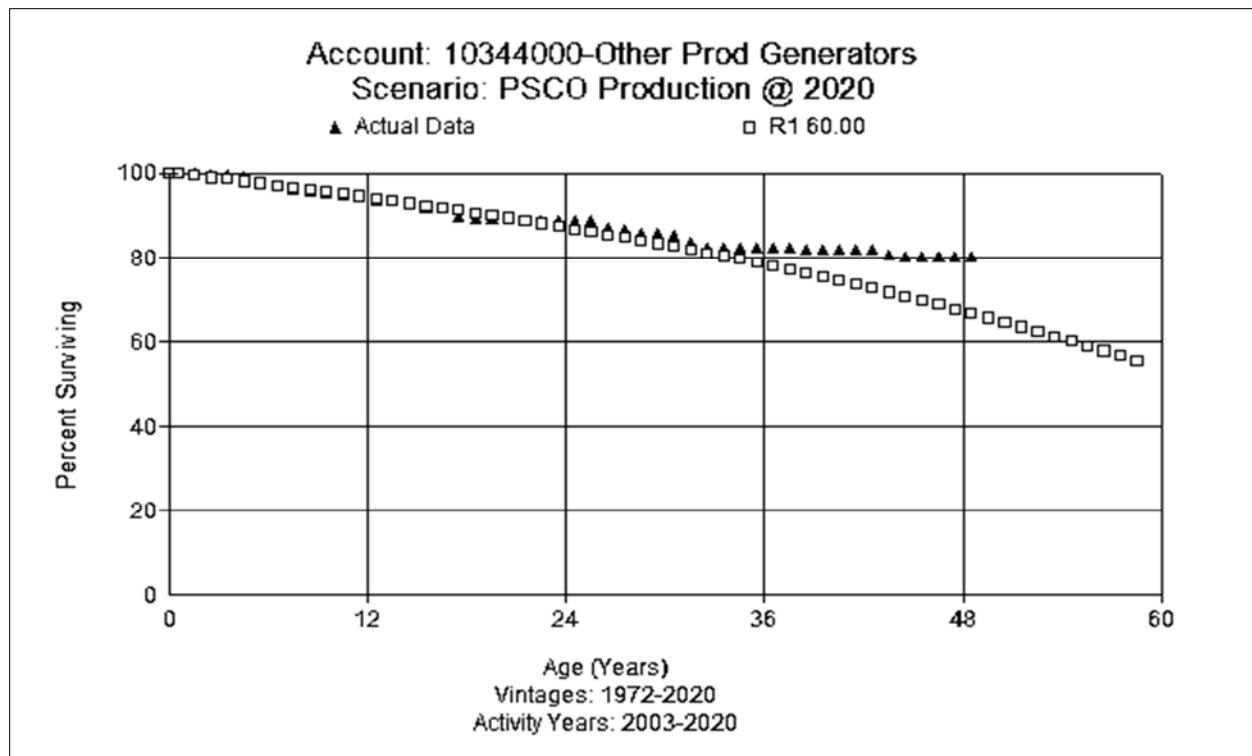
FERC Account 343.0 Prime Movers (61 R0.5)

This account consists of heat recovery steam generators, cooling tower systems, foundations, gas turbines, controls, tack mufflers, and other related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. Discussions with Company personnel indicated that this account should be comparable to steam boiler plant. A majority of the investment is at Cherokee and Ft. Saint Vrain. The visual fits show a life that is much lower than normally experienced for interim retirements in this account. Based on judgment and the recommendation for Account 312, this study recommends a 61 R0.5 dispersion curve for interim retirements, which is shown below.



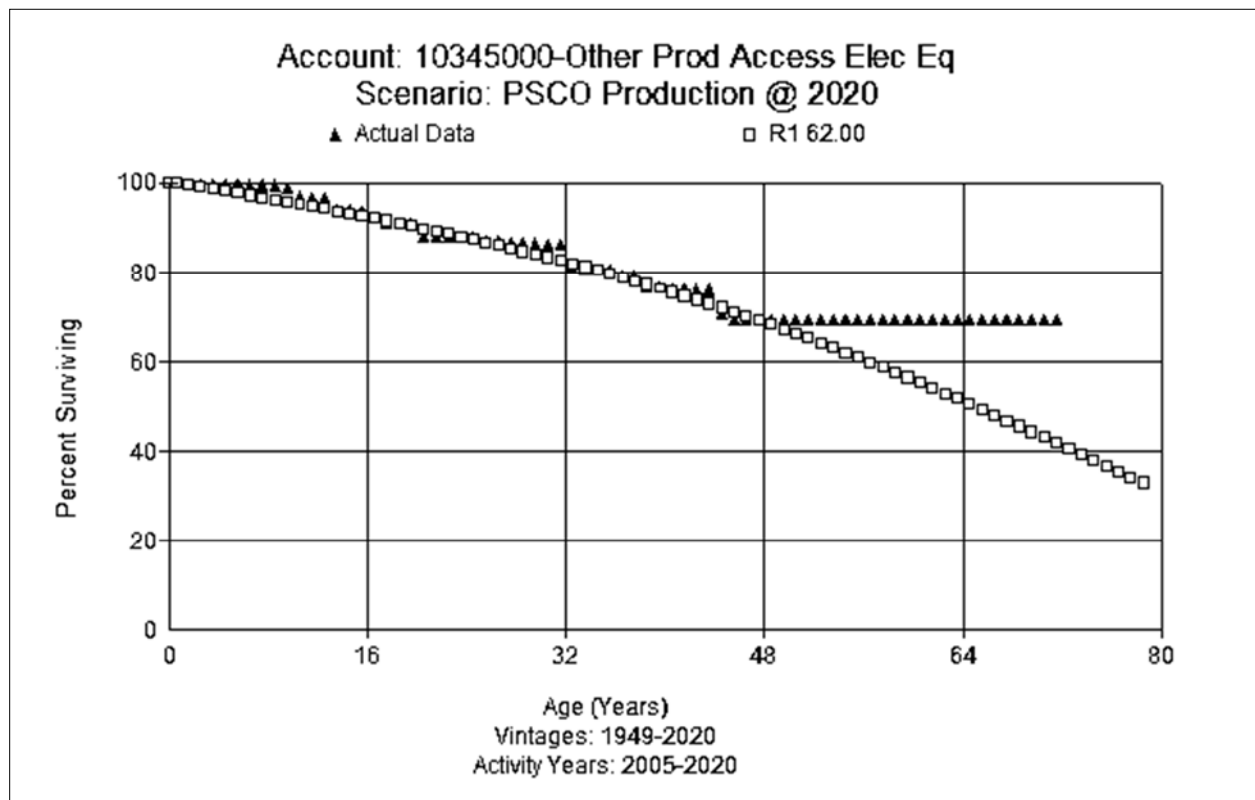
FERC Account 344.0 Generators (60 R1)

This account consists of generators, gas turbines and control systems, circulating water systems, and other related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. Discussions with Company personnel indicated that the rotating parts are replaced every 5-6 years, hot gas path components are replaced periodically, and rotors are replaced at least once during the life of the unit. Around half of the assets would be retired over the life of the units. There is little data on which to base a life selection. All bands show a life that is slightly longer than is normally expected for interim retirements in this account. The R1 60 in the full band is a reasonable fit. Based on judgment, this study recommends a 60 R1 dispersion curve for interim retirements, which is shown below.



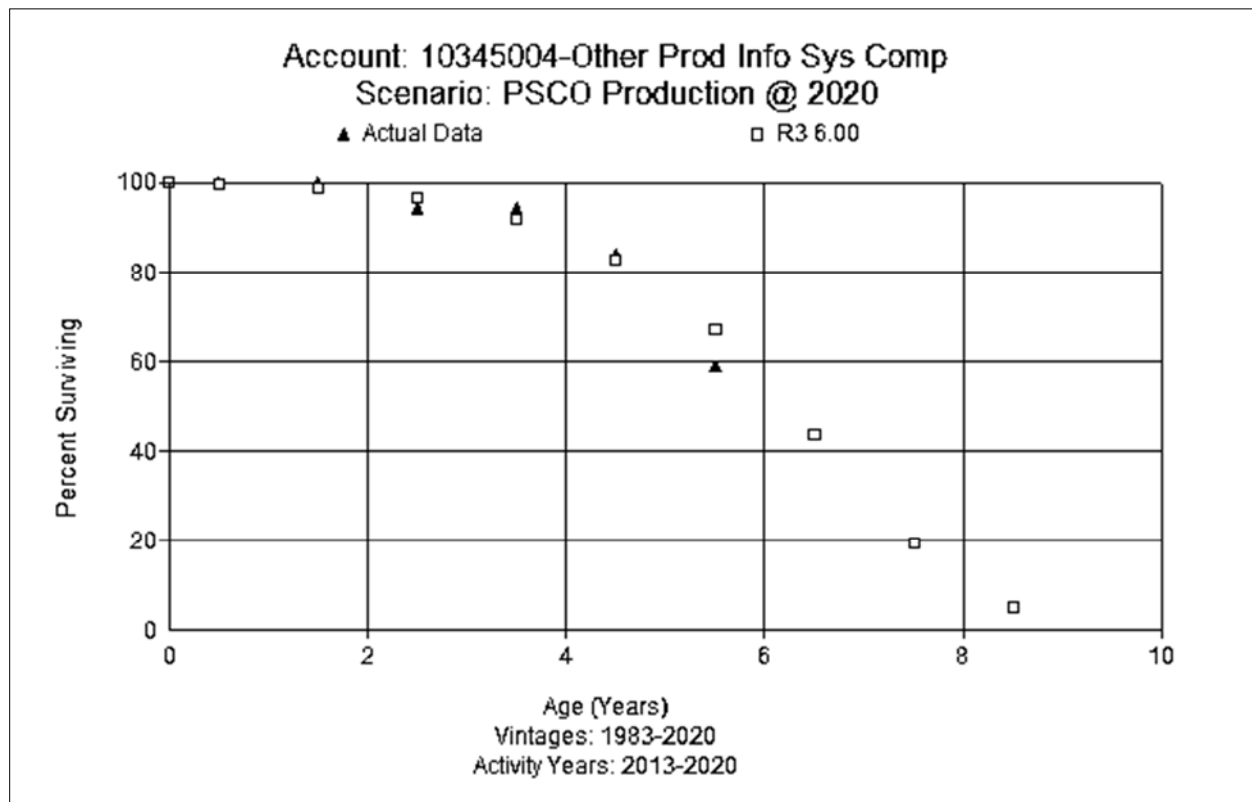
FERC Account 345.0 Accessory Electric Equipment (62 R1)

This account consists of station controls, motor control center, station wiring, fire protection system, power supply, regulators, and related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. All bands show a life that is between 55 and 75 years. Based on judgment, this study recommends a 62 R1 dispersion curve for interim retirements, which is shown below.



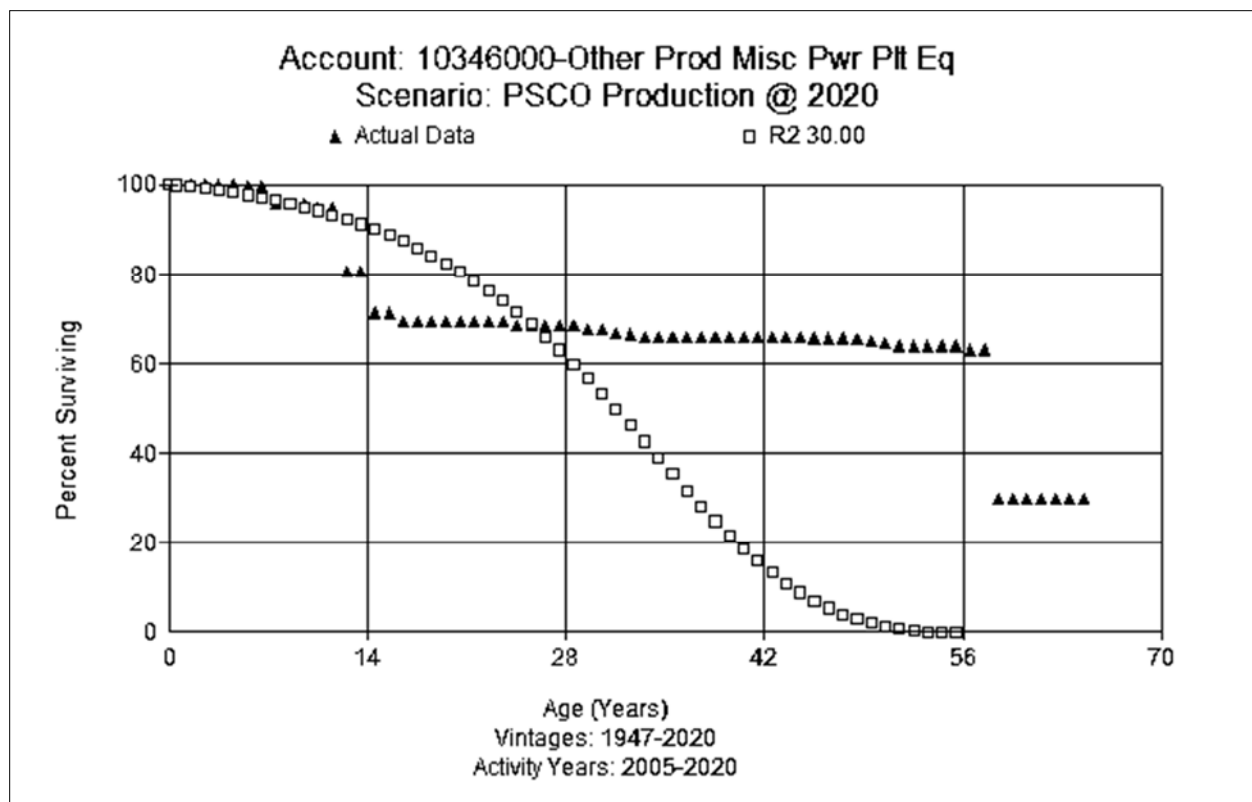
FERC Account 345.2 Computers and Peripherals (6 R3)

This account consists of computers, peripherals, and station control related assets at each plant. Retirement dates for each unit are found in Appendix D. These assets are driven by changes in technology and tend to have a shorter life than other equipment. This study recommended 6 R3 dispersion curve for interim retirements is shown below.



FERC Accounts 346.0 Miscellaneous Power Plant Equipment (30 R2)

This account consists of Instruments for air systems, work equipment, test equipment, pumps, fire protection systems, and other related assets at each power plant. Retirement dates for each unit are found in Appendix D. The prior study utilized interim retirement ratios. All bands show a life that is lower than what is expected for interim retirements in this account. Based on judgment, this study recommends a 30 R2 dispersion curve for interim retirements, which is shown below.



WIND PRODUCTION

PSCo has added two wind farms to its other production function: Cheyenne Ridge in 2018 and Rush Creek in 2020. As of December 31, 2020, Cheyenne Ridge had a total plant investment of \$654.8 million and Rush Creek had \$897.5 million. Given the lack of data and the current age of the plants, this study estimates no interim retirements for wind assets. This will be reviewed in the next depreciation study.

FERC Account 341.0 Structures and Improvements (25 SQ)

This account consists of buildings, structures, fences, lighting systems, and other related assets at each wind farm. Retirement dates for each unit are found in Appendix D.

FERC Account 342.0 Fuel Holders and Accessory Equipment (25 SQ)

This account consists of auxiliary boilers, feedwater systems, pumps, storage tanks, natural gas/fuel oil piping, and other related assets at each wind farm. Retirement dates for each unit are found in Appendix D.

FERC Account 344.0 Generators (25 SQ)

This account consists of generators, control systems, and other related assets at each wind farm. Retirement dates for each unit are found in Appendix D.

FERC Account 345.0 Accessory Electric Equipment (25 SQ)

This account consists of station controls, motor control center, station wiring, fire protection system, power supply, regulators, and related assets at each wind farm. Retirement dates for each unit are found in Appendix D.

FERC Accounts 346.0 Miscellaneous Power Plant Equipment (25 SQ)

This account consists of instruments for air systems, work equipment, test equipment, pumps, fire protection systems, and other related assets at each wind farm. Retirement dates for each unit are found in Appendix D.

PROFORMA SOLAR PRODUCTION

PSCo intends to add solar production units to its portfolio of generating assets. Two solar gardens are planned to come online in 2021 at the Arapahoe and Valmont locations. The Study recommendations are based on current industry estimates for these types of assets and judgment. See Appendix A-3 for the rate calculations.

FERC Account 341.0 Structures and Improvements (25 R2)

This account consists of buildings, structures, fences, lighting systems, and other related assets at each solar facility. Retirement dates for each unit are found in Appendix D.

FERC Account 342.0 Fuel Holders and Accessory Equipment (25 R2)

This account consists of auxiliary boilers, feedwater systems, pumps, storage tanks, natural gas/fuel oil piping, and other related assets at each solar facility. Retirement dates for each unit are found in Appendix D.

FERC Account 344.0 Generators (25 R2)

This account consists of generators, control systems, and other related assets at each solar facility. Retirement dates for each unit are found in Appendix D.

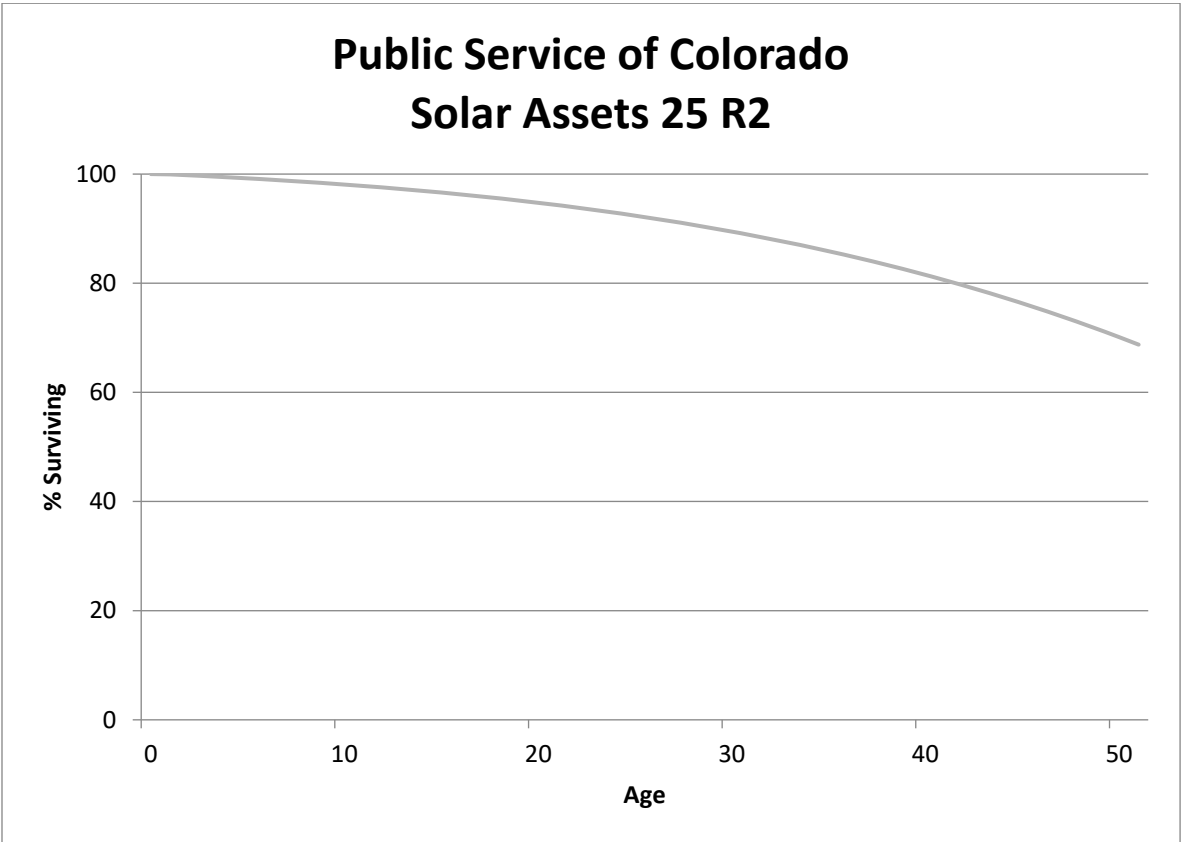
FERC Account 345.0 Accessory Electric Equipment (25 R2)

This account consists of station controls, motor control center, station wiring, fire protection system, power supply, regulators, and related assets at each solar facility. Retirement dates for each unit are found in Appendix D.

FERC Accounts 346.0 Miscellaneous Power Plant Equipment (25 R2)

This account consists of Instruments for air systems, work equipment, test equipment, pumps, fire protection systems, and other related assets at each solar facility. Retirement dates for each unit are found in Appendix D.

Using judgment, a 25 R2 interim retirement curve is recommended for all solar accounts. Both solar garden facilities are estimated to have a 25-year life span. A generic curve showing the retirement pattern of the recommended interim retirement curve is shown below.



PROFORMA OTHER PRODUCTION

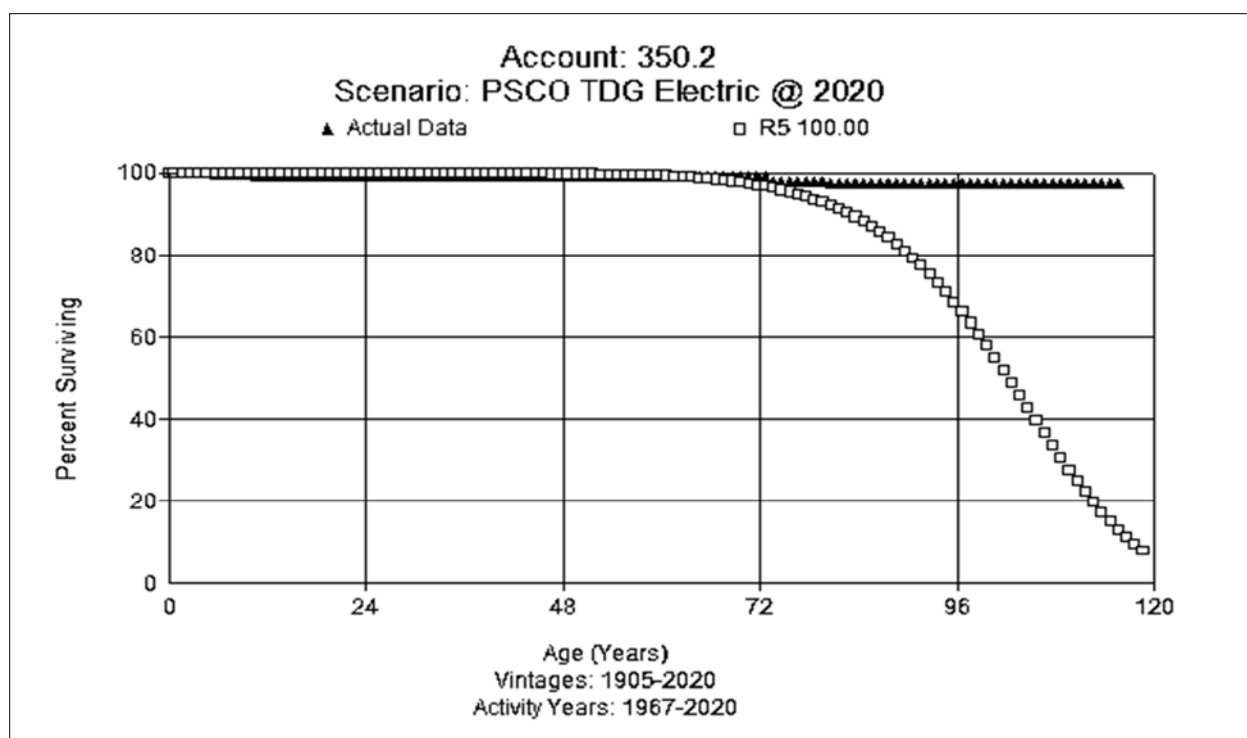
PSCo intends to add an additional plant, Manchief. Manchief will be purchased in 2022 from Southwest Operating Company, LLC. The acquisition of this facility and its life were approved in Docket No. 19A-0409E. Data provided by the Company indicates that this facility is similar to Blue Spruce. Based on the current investment at Blue Spruce, the total cost of Manchief is allocated to the plant account level. This Study recommends the use of the same interim retirement life and curves for the accounts in the Other Production function. See Appendix A-3 for the rate calculations.

TRANSMISSION PLANT

Transmission Accounts, FERC Accounts 350.2–359.0

FERC Account 350.2 Land Rights (100 R5)

This account includes the cost of rights of way in connection with transmission plant. The balance in this account is \$96.1 million. Currently, the life for this account is 100 years with an R5 dispersion. There is limited information on which to perform actuarial analysis. Based on judgment and the type of assets in this account, this Study recommends retaining the 100-year life and the R5 dispersion. A graph of the observed life table versus the proposed curve is shown below.

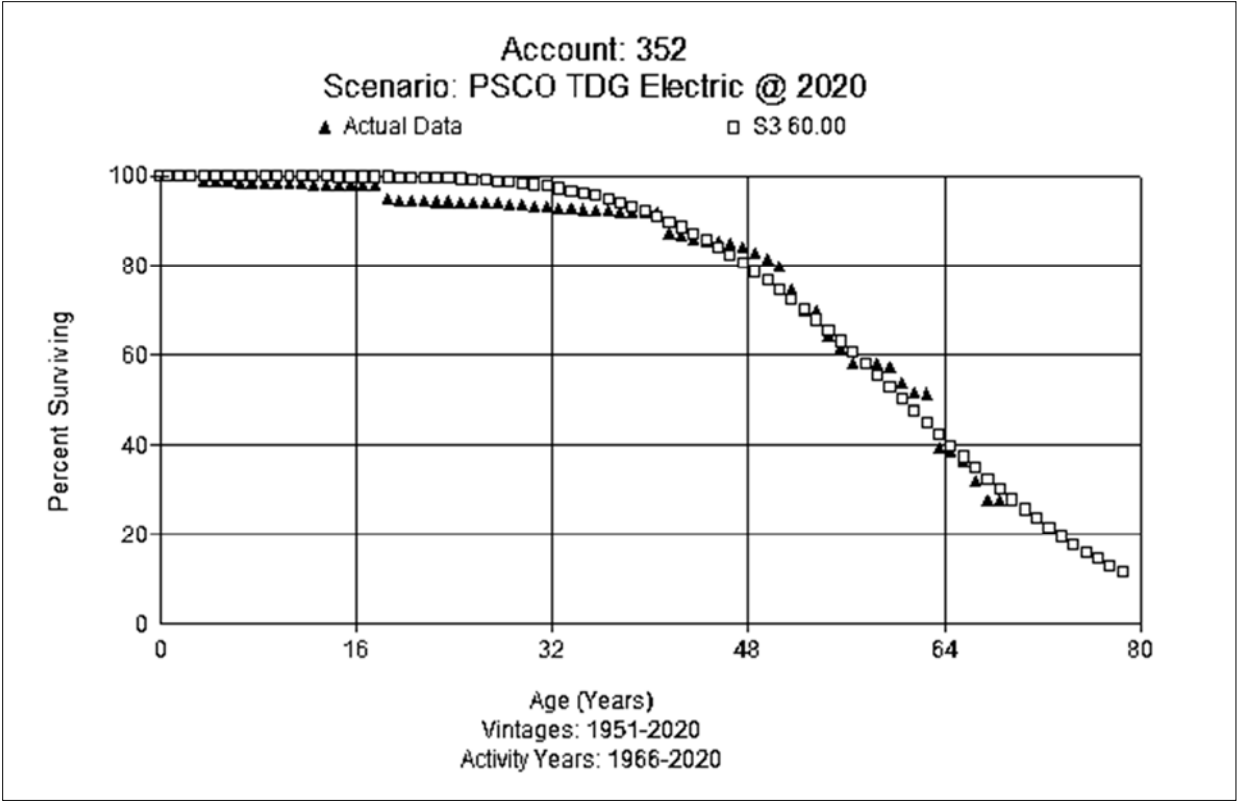


FERC Account 352.0 Structures and Improvements (60 S3)

This account includes the cost of structures and improvements in connection with building station control, security systems, yard improvements, protective fencing, and other structures for transmission plant. There is approximately \$140.3 million in this account. The current approved life for this account is 88 years with a S2 dispersion.

Discussions with Company personnel indicated that most of the transmission structures are steel. Transmission would be less likely to be moved and may be more robust than distribution structures. Around 10 years ago, the Company started aggressively upgrading stations, which have triggered retirements at a younger age in transmission. The Company has also changed their yard improvement policy: rock is replaced more often and other items, such as retaining walls, may be replaced on capital depending on percentage.

The actuarial analysis on this account and judgment shows a shorter life and steeper dispersion pattern across most of the bands analyzed. Based on the indications from the actuarial analysis, judgment, and the type of assets in this account, this Study recommends decreasing the life to 60 years and moving the dispersion to S3. A graph of the observed life table versus the proposed curve is shown below.

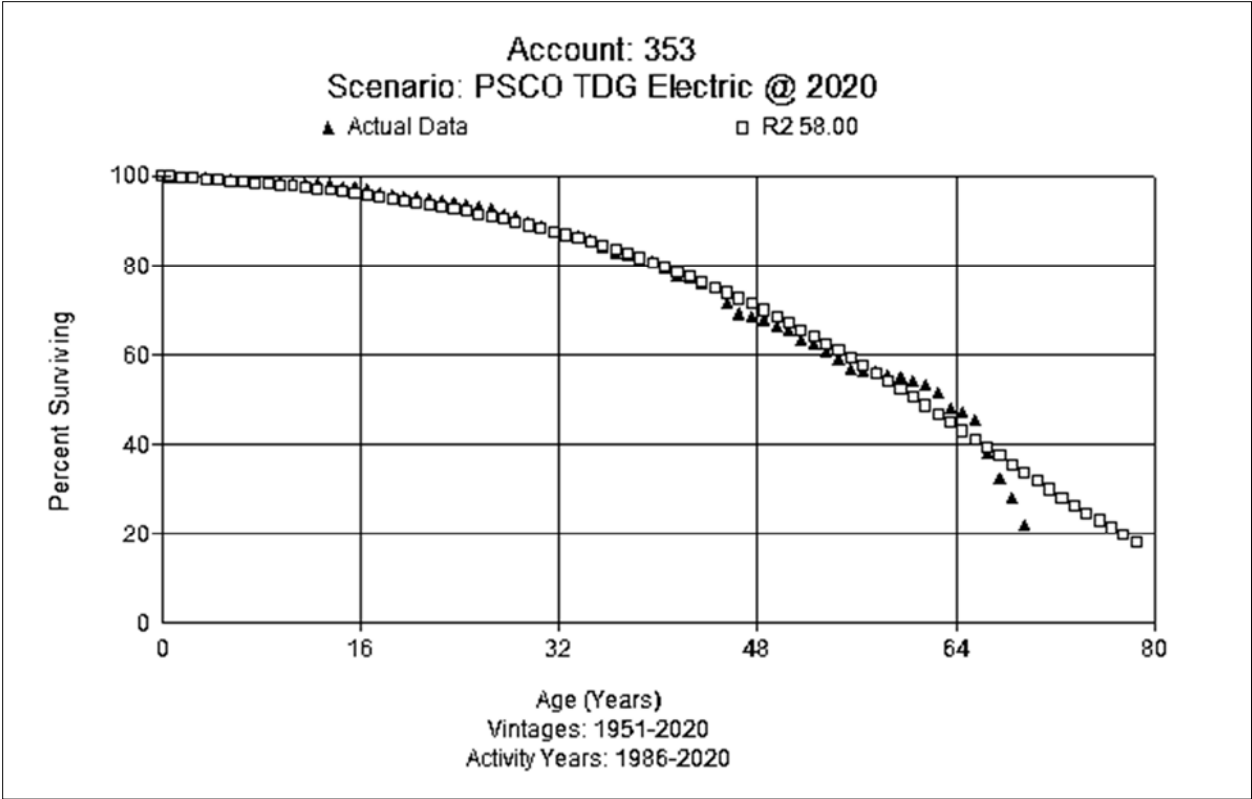


FERC Account 353.0 Station Equipment (58 R2)

This account includes the cost of transformers, capacitor banks, circuit breakers, cubicle switchgear, equipment foundation, station controls, and station wiring for transmission plant. There is approximately \$1.3 billion in this account. The current approved life for this account is 58 years with an R2 dispersion.

Discussions with Company personnel indicated that Transmission and Distribution use FIFO for retirements. They would expect the life to start decreasing as the older asset dollars are retired. The Company tends to retire transformers instead of redeploying when replaced for capacity needs. Failure rates of transmission transformers is higher at higher voltages, which causes more failures at a lower life. The Company has also installed a large number of static VAR equipment (circuit breakers), which have a shorter life and are now the standard design. The SF6 circuit breakers associated with the static VAR equipment will have a 10-year life, which is much shorter than the normal SF6 circuit breaker life. There are 793 circuit breakers and 250 of those circuit breakers are SF6. The capacitor banks have a life of around 35 years. Oil circuit breakers may last 50 years but many have been replaced due to current interruption criteria.

The actuarial analysis indicates a life that is consistent with the existing across the bands analyzed. Based on the actuarial analysis, type and mix of assets, input from Company, and judgment, this Study recommends retention of the 58 R2. A graph of the observed life table versus the proposed curve is shown below.

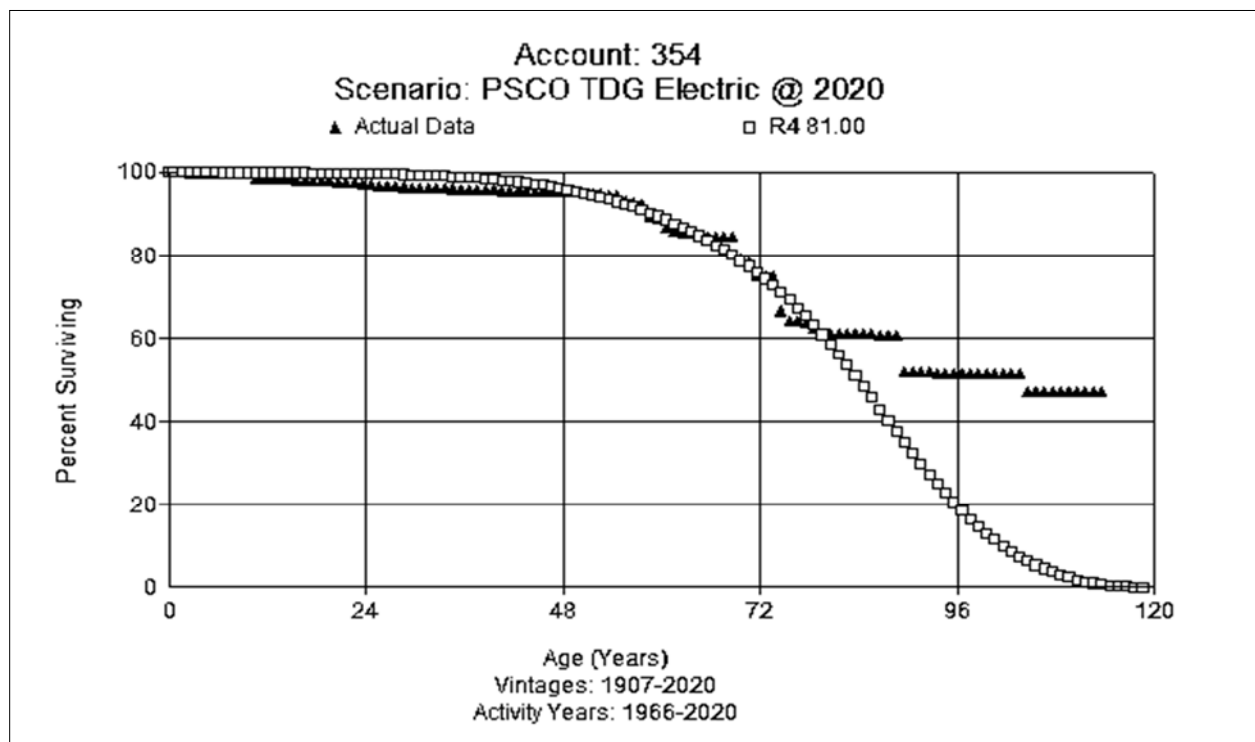


FERC Account 354.0 Towers & Fixtures (81 R4)

This account includes towers and non-wood poles for transmission plant. At December 31, 2020, there was approximately \$162.4 million in this account. The current approved life for this account is 81 R4.

Discussions with Company personnel indicated that they are not seeing many failures in transmission towers. The Company has several older lattice towers still in service. Primary concerns are with foundations and subsurface conditions, and some areas may require upgrades due to capacity needs. Company personnel believe that an 80-year average life is not unreasonable.

The fuller placement bands provide better indication of expected life. In the fuller placement and experience, the life is consistent with the existing life. Based on the actuarial analysis, Company input, type of assets in this account, and judgment, this Study recommends retention of the existing 81 R4. A graph of the observed life table versus the proposed curve is shown below.

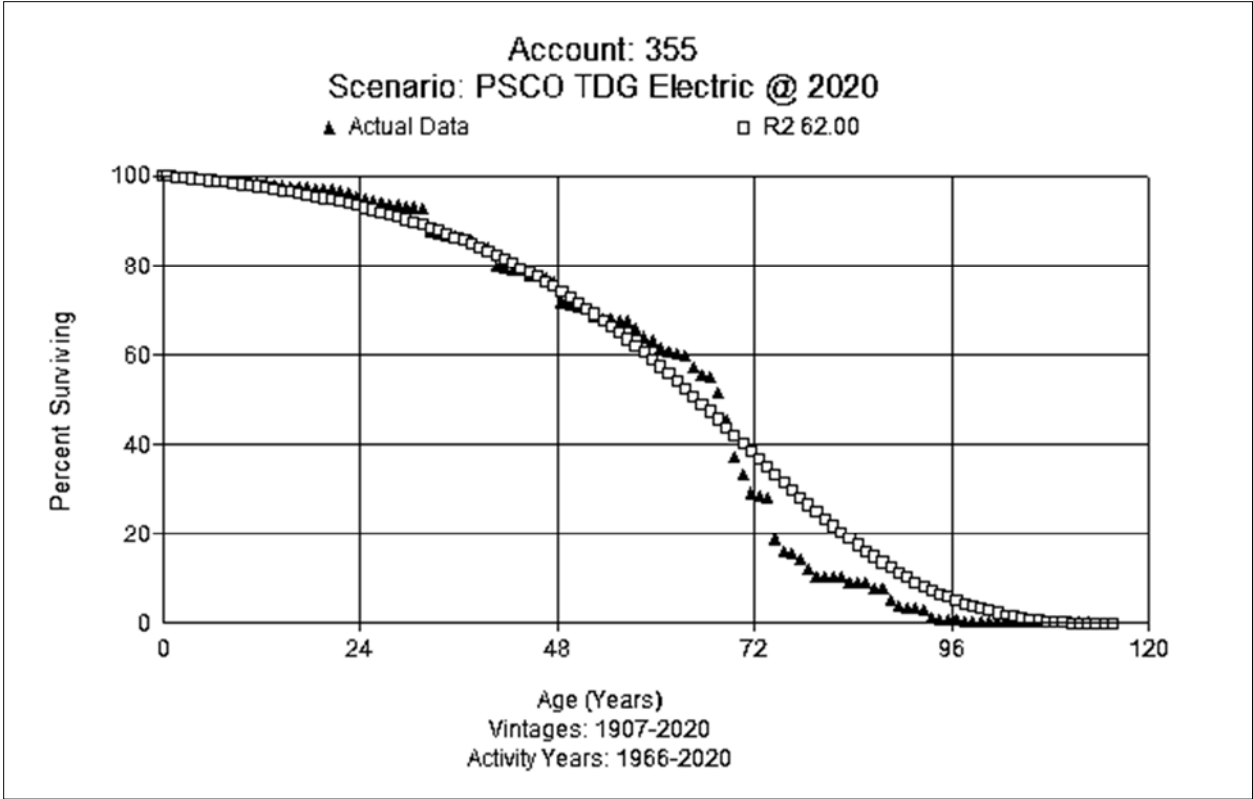


FERC Account 355.0 Poles & Fixtures (62 R2)

This account includes equipment foundation and many kinds of poles for transmission plant. There is approximately \$713.7 million in this account as of December 31, 2020. The current approved life for this account is 62 R2.5 dispersion.

Discussions with Company personnel indicated that the Company has a wildfire mitigation program in place in the last couple of years. They are rebuilding wood with steel in this program. The Company is targeting defects in wildfire zones for replacement, as well as an aging line program that prioritizes replacement of wood poles over 60 year and steel poles over 70 years. The Company has a structured testing program that identifies priority defects, which causes replacement earlier than would have occurred in prior years. The first polymer insulators from the 1980s have all been replaced. The Company uses glass on dead end structures and polymer on tangent. They have started to see some composite structures, which they expect will have a longer life than wood and perhaps as long as steel.

The actuarial analysis indicates a life that is consistent with the existing 62 years in the fuller bands. In some of the more recent bands, keeping with the R dispersion, the life indication is around 52-55 years, which supports the Company's statement above on its testing and replacement program. The full placement and experience band provide a good fit with the 62 R2. Based on the actuarial analysis, Company input, judgment, and the type of assets in this account, this Study recommends retention of the 62-year life but changing to a slightly flatter, R2, dispersion. A graph of the observed life table versus the proposed curve is shown below.

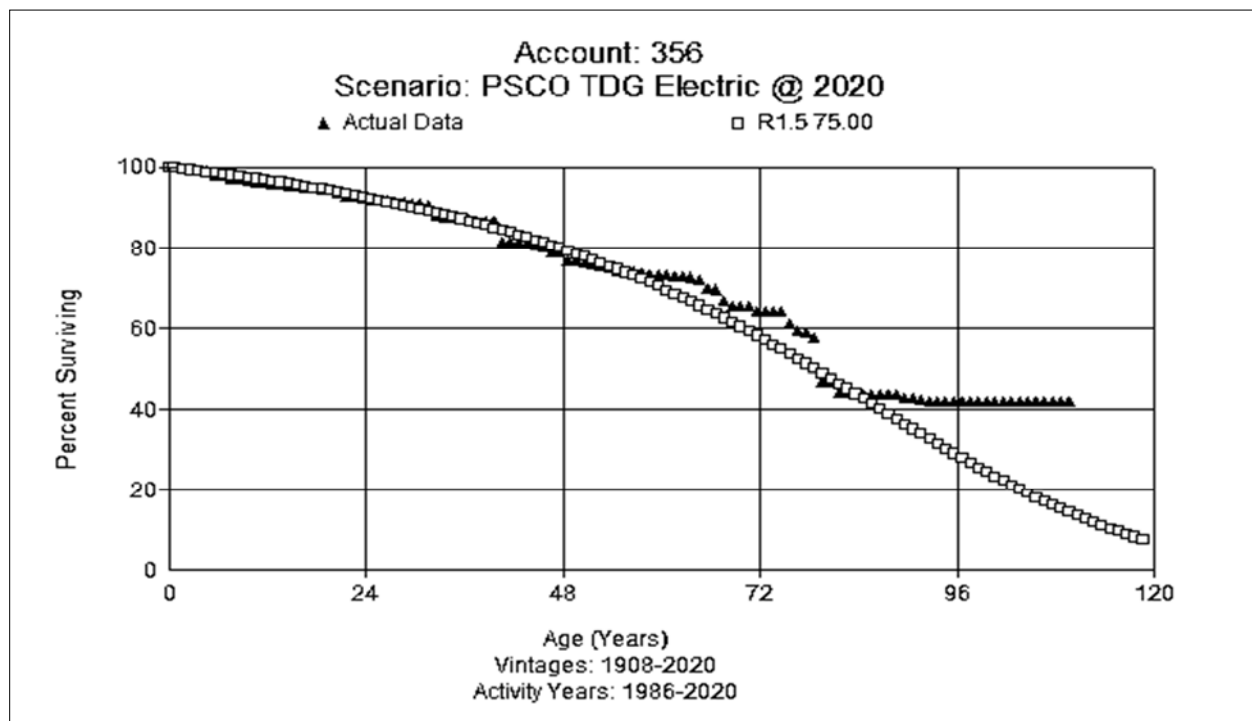


FERC Account 356.0 OH Conductors & Devices (75 R1.5)

This account includes overhead conductors and devices for transmission plant. There is approximately \$395.9 million in this account as of December 31, 2020. The current approved life for this account is 70 R2.

Discussions with Company personnel indicate that they would expect the life of conductor to be longer than that of poles. They do not have the strand issues and reconductoring issues that others may see. Changes in capacity may shorten the life of some conductor. Dampers are property units and would be expected to have a shorter life than the conductor. Arrestors are capital and have a short life expectancy and are being replaced at less than 20 years. There are quite a few switch replacement projects, and the Company is getting between 40-50 years from them. They are seeing some obsolescence due to unavailability of parts.

The actuarial analysis supports Company information and expectations with a longer life indicated across the bands analyzed. Based on the actuarial analysis, Company input, judgment, and the type of assets in this account, this Study recommends increasing the life to 75 years and moving to the R1.5 dispersion. A graph of the observed life table versus the proposed curve is shown below.

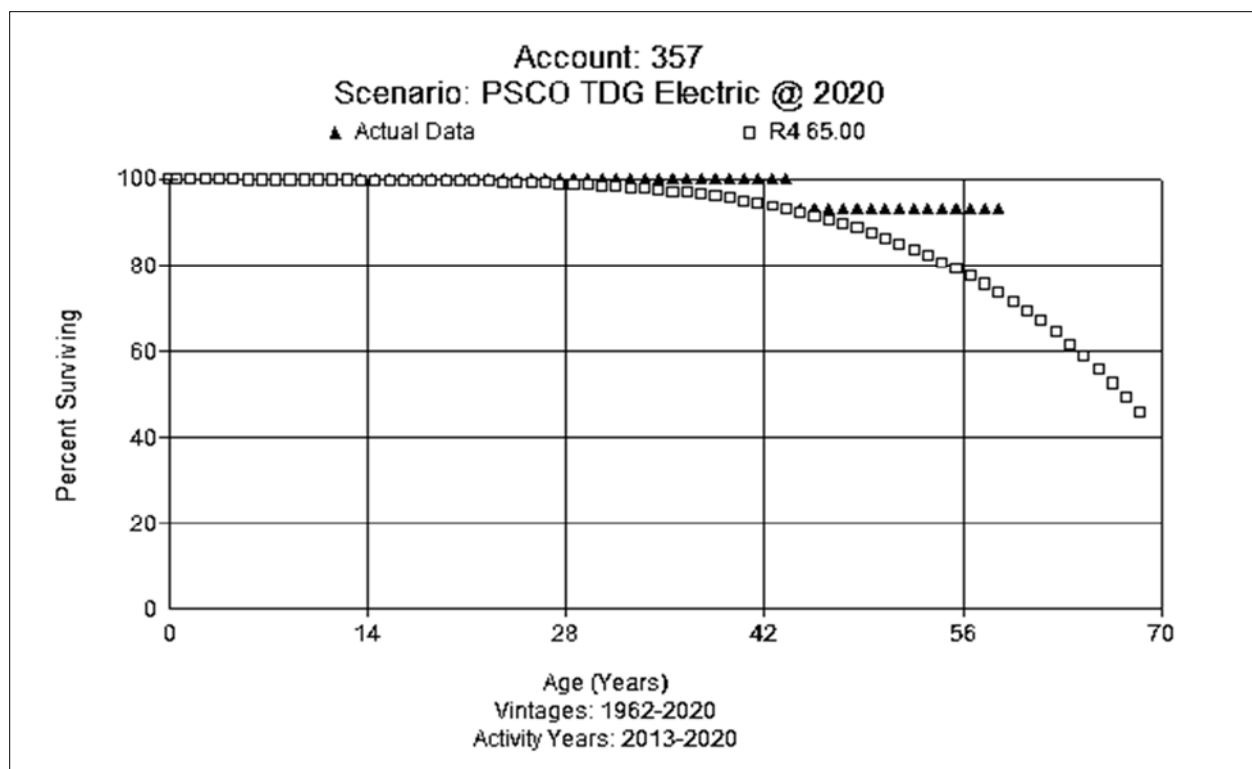


FERC Account 357.0 UG Conduit (65 R4)

This account includes underground conduit for transmission plant. At December 31, 2020, there is approximately \$47.3 million in this account. The current approved life for this account is 60 years with an R3 dispersion.

Discussions with Company personnel indicated that older underground conductor had been in oil filled pipe, but newer conductor is XLPE and is in concrete conduit. There is no direct buried cable. Life expectancy for oil filled is reasonably good. Likely failures in oil-filled conduit would be due to oil loss and flashovers or termination issues. In oil filled pipe, they have seen the pipe fail before the conductor. Oil filled conduit has at least a 50-year life expectancy, maybe more, and there is some expectation that newer (non-oil filled) conduit will have a longer life. At this point in time, experience indicates that it is lasting longer than 50 years.

The retirement activity in this account has been limited, so based on Company input, the limited analysis, the type of assets in this account, and judgment, this Study recommends moving to a 65-year life and steeper R4 dispersion. A graph of the observed life table versus the proposed curve is shown below.

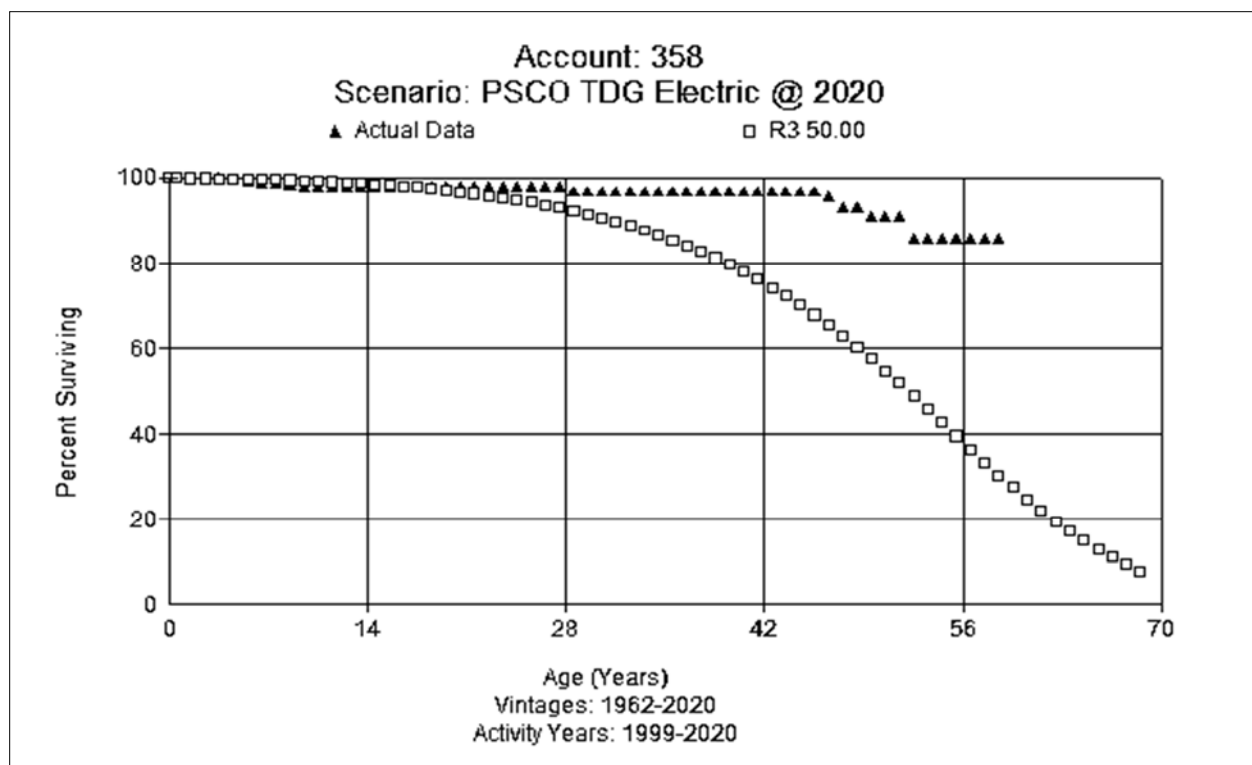


FERC Account 358.0 UG Conductors & Devices (50 R3)

This account includes underground conductors and devices for transmission plant. At December 31, 2020, there was approximately \$72.0 million in this account. The current approved life for this account is 50 years with an R3 dispersion.

Discussions with Company personnel indicated that there is around 100 miles of underground transmission. Currently, there are two types of conductor: oil filled and XLPE. If the oil filled is kept free of contaminants, it will have a very long life. The oldest oil filled was built in the 1960s. The pipe will likely rust out before the cable is damaged. The Company has had to replace some oil pumping plants recently and expects it will replace more in the next few years. Pumping plant for oil filled may only last 30-40 years. The Company started installing XLPE in the 1990s and it is generally put in a concrete duct bank. A vast majority of the investment is in newer, more expensive (current construction costs) XLPE conductor. They hope to get 50 years out of the XLPE.

There is limited data on which to perform life analysis. Based on the judgment and the type of assets in this account, this Study recommends retaining the 50 R3 dispersion. A graph of the observed life table versus the proposed curve is shown below.

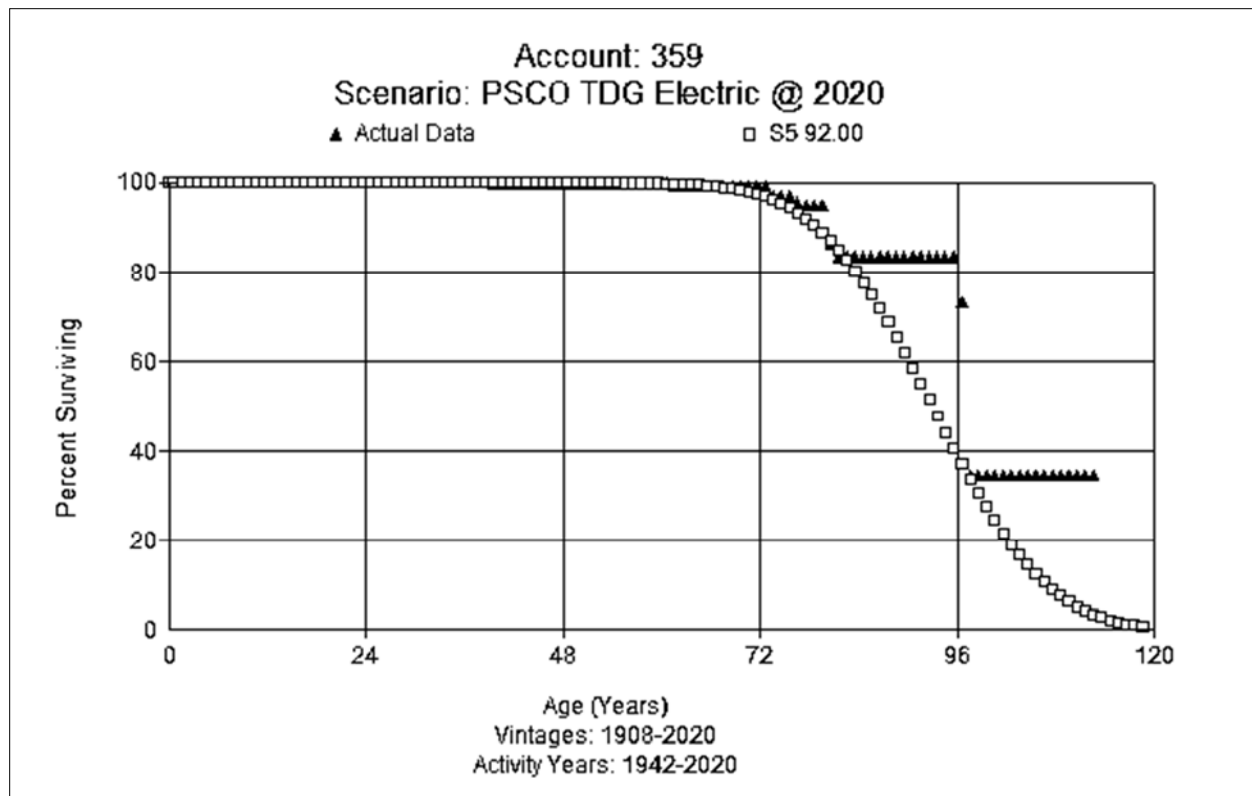


FERC Account 359.0 Roads & Trails (92 S5)

This account includes bridges, roads, and yard improvements for transmission plant. At December 31, 2020, there was approximately \$3.9 million in this account. The approved life is 92 years with the S5 dispersion.

Discussions with Company personnel indicated that they will only have non-paved roads and will maintain through regrading.

There is limited activity, but based on the actuarial analysis, this Study recommends retention of the existing 92 S5. A graph of the observed life table versus the proposed curve is shown below.



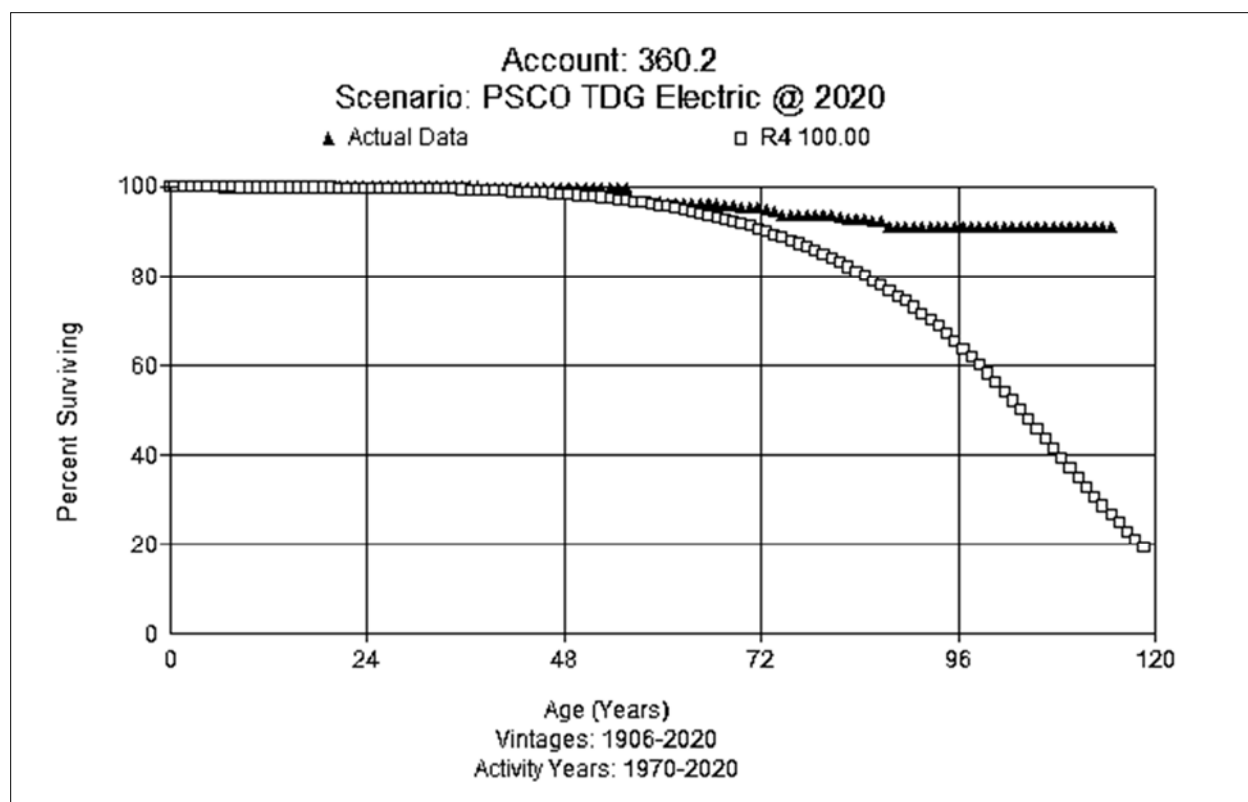
DISTRIBUTION PLANT

Distribution Accounts, FERC Accounts 360.2–373.0

FERC Account 360.2 Land Rights (100 R4)

This account contains right of way for distribution plant. At December 31, 2020, there was approximately \$48.0 million in this account. The current approved life for this account is 100 years with an R4 dispersion.

Based on the limited actuarial analysis, the type of assets in this account, and judgment, this Study recommends retention of the existing 100 R4. A graph of the observed life table versus the proposed curve is shown below.

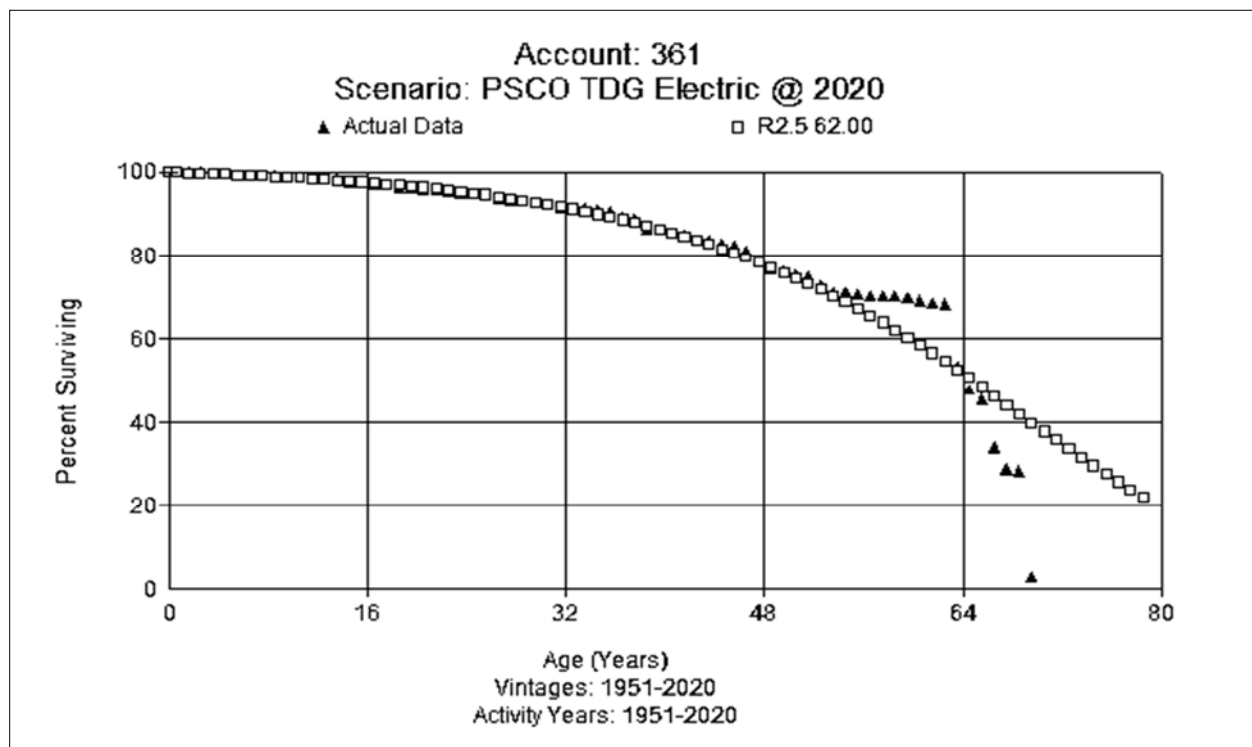


FERC Account 361.0 Structures & Improvements (62 R2.5)

This grouping contains facilities, such as building station control, fencing, yard improvements, and other structures for distribution plant. At December 31, 2020, there was approximately \$100.3 million in this account. The approved life and curve is 65 R2.

Discussions with Company personnel indicated that they generally do not install wood anymore, but some wood remains. Distribution structures are more prone to relocation. The Company has recently changed its yard policy and rock will be replaced more often and other items such as retaining walls may now be replaced as capital, depending on the percentage.

Based on the actuarial analysis, the type of assets in this account, and judgment, this Study recommends moving the life to 62 years and moving to an R2.5 dispersion. A graph of the observed life table versus the proposed curve is shown below.

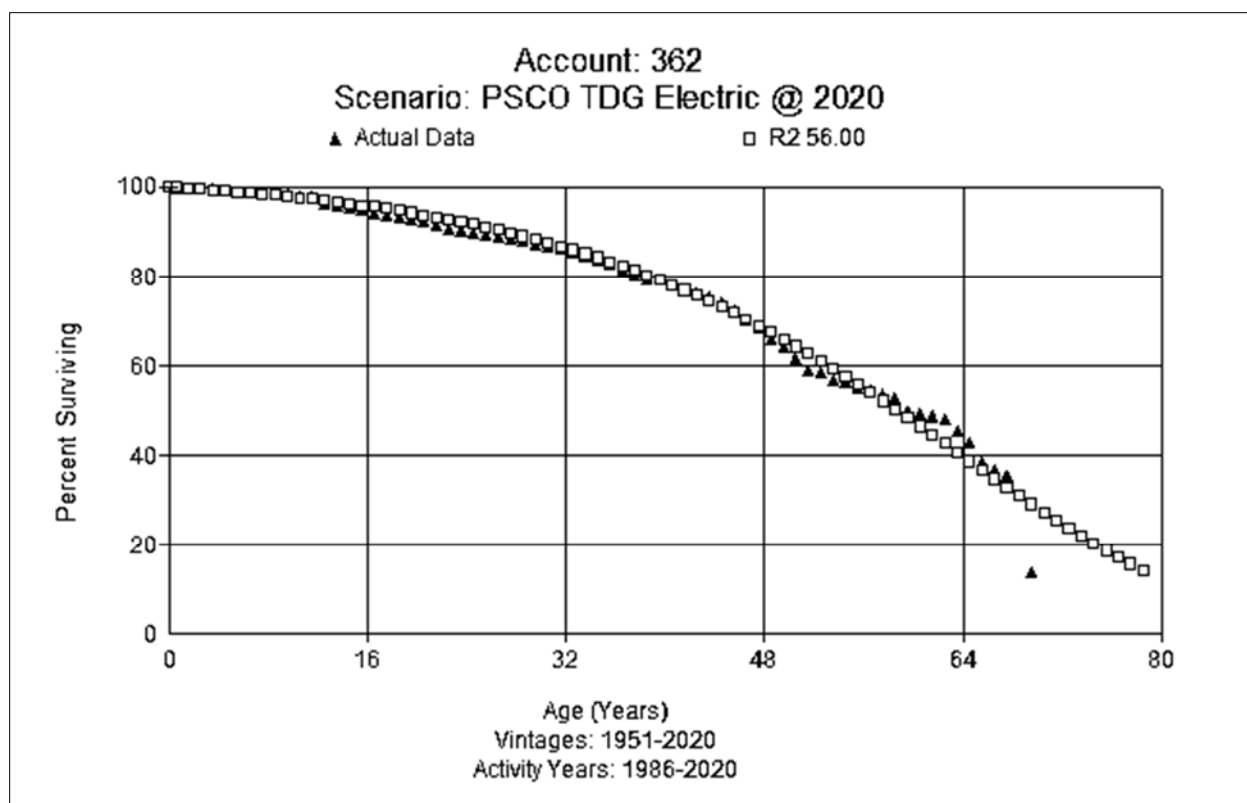


FERC Account 362.0 Station Equipment (56 R2)

This grouping contains switchboards, station wiring, transformers, and a wide variety of other equipment, from circuit breakers to switchgear, for distribution plant. At December 31, 2020, there was approximately \$743.1 million in this account. The existing approved life is 57 years with an R1.5 dispersion curve.

Discussions with Company personnel indicated that FIFO is being used for retirements. There are approximately 1700 circuit breakers and 450 power transformers. Less than 44 kV would be considered distribution substations from an operational standpoint. Distribution substations have had fewer upgrades than transmission facilities. The distribution circuit breakers are primarily vacuum. Oil and vacuum would have a longer life than air magnetic, which is 35-45 years old at retirement. They expect to see a shorter life overall for distribution circuit breakers due to a variety of designs. Distribution breakers are originally capitalized as part of switchgear but when replaced, are recapitalized separately. In distribution, there are 250 transformers older than 20 years and 150 that are younger than 20 years. Electromechanical relays have a long life, but the Company has replaced relays due to system configuration changes, etc. For electromechanical relay, a 40-year life is reasonable, but electronic (microprocessor) equipment would have a shorter life, and 20 years would be a reasonable and optimistic life. They are moving to digital relays in transmission and distribution functions. Manufacturers are not supporting equipment as long as they used to. There is a large push to install monitoring equipment in substations, which would not be expected to have a long life. They also are moving more to replace versus repairing assets.

In the actuarial analysis, the life indication across the bands analyzed is in the range of 56-57 years. In the mid-range placement and experience bands there is an excellent fit with the 56 R2 dispersion. Based on the analysis, type of assets, and Company input, this Study recommends moving to a 56 R2. A graph of the observed life table versus the proposed curve is shown below.



FERC Account 363 Energy Storage Equipment (proposed 10-year life)

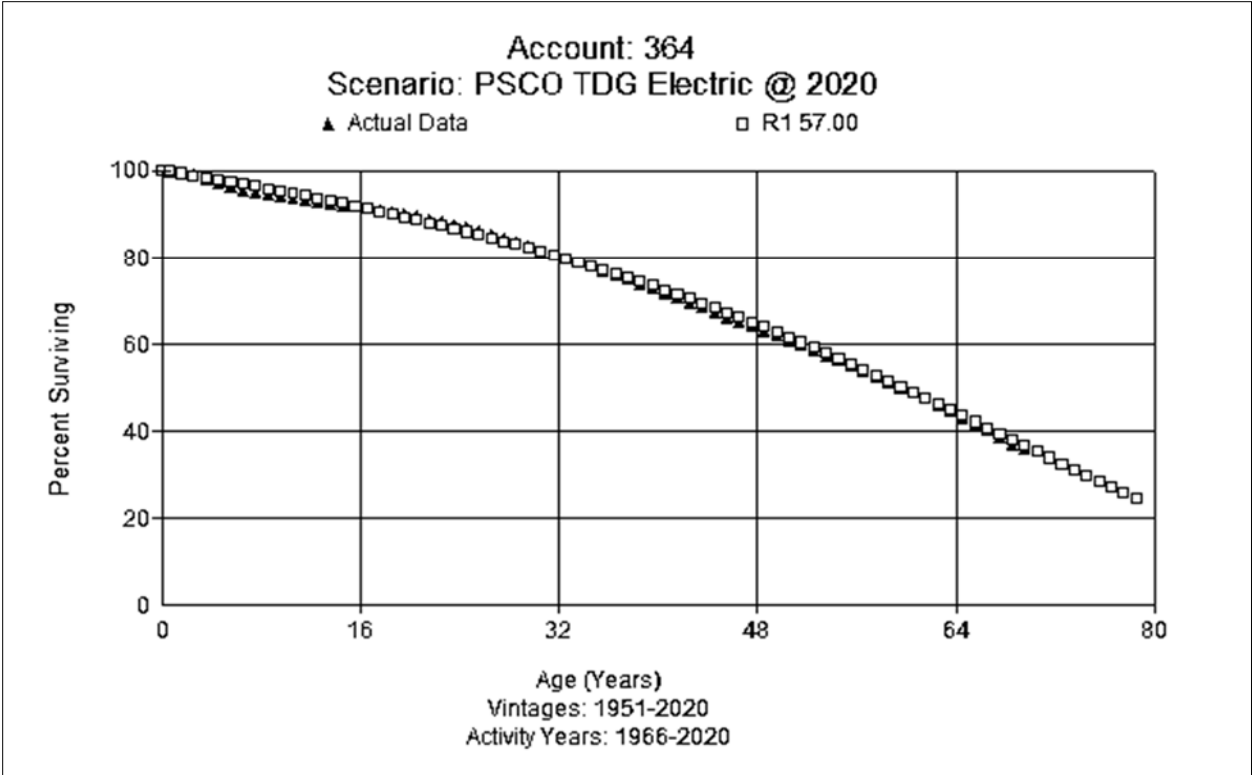
This account includes energy storage equipment. This is a new account that has not been used in the past, and there is no investment at December 31, 2020. Based on information from the Company, a 10-year life is recommended for this account.

FERC Account 364.0 Poles, Towers & Fixtures (57 R1)

This account contains poles, towers, and fixtures for distribution plant, which are predominantly made of wood. At December 31, 2020, there was approximately \$470.7 million in this account. The approved life is 54 S0.

Discussion with Company personnel indicated there are few steel or concrete poles. In 2012 -2013, the Company changed the method used to treat wood poles from creosote to a penta treatment. The long-term effect on life is uncertain until more is added to the system. The Company has an inspection process in place. There are more than 10,000 poles with a very low failure rate due to the climate. The main causes for retirements are public damage, relocation, and some physical issues. Often the poles being replaced are over 50 years old, so a 55-year life seems reasonable.

The fits across the bands analyzed indicate some variability in the life range and dispersion pattern. In the mid-bands, the R1 57 is a perfect fit and is within reasonable range of Company expectations. Based on the actuarial analysis, Company input, and judgment, this Study recommends moving to a 57-year life with the R1 dispersion. A graph of the observed life table versus the proposed curve is shown below.

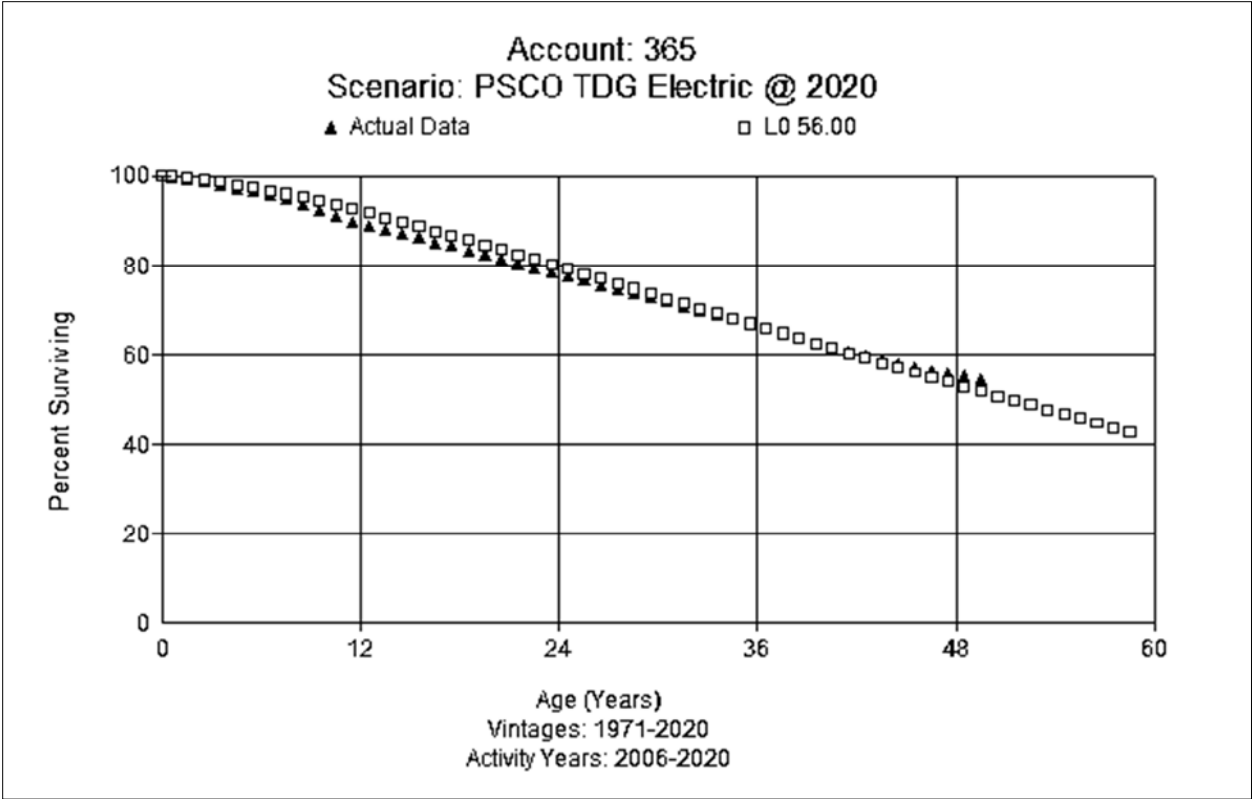


FERC Account 365.0 OH Conductor & Devices (56 L0)

This account consists of overhead (OH) conductor of various thickness, as well as various switches and reclosers. At December 31, 2020, there was approximately \$459.4 million in the account. The approved life is 50 R0.5.

Discussions with Company personnel indicated that conductor should last as long as the poles. Major causes for replacement are load driven and overhead (“OH”) to underground (“UG”) conversion. The Company has started a wildfire program where they are replacing some very old conductor. When moving to UG, they will install a different type of conductor. They now use polymer insulators, but porcelain is still predominant. There have been improvements in the loading of the conductor, which should help the life. There may be fewer replacements due to the cooler summers over the last 10 years. In some cases, the Company will upgrade conductor (sometimes they will change poles, sometimes not) or do OH to UG conversion. They perform a significant number of conversions every year, which carries a 1% fee as part of franchises. When upgrading, poles may not meet current weight standards. Various configurations of upgrading can take place.

The actuarial analysis indicates a life as long as 56 years, but most bands and fits were between 45-55 years. In the mid-band placement and most recent experience band, an excellent fit was made with 56 L0. Based on the actuarial analysis, Company input, the type of assets, and judgment, this Study recommends moving to the L0 dispersion curve and increasing the life to 56 years. A graph of the observed life table versus the proposed curve is shown below.

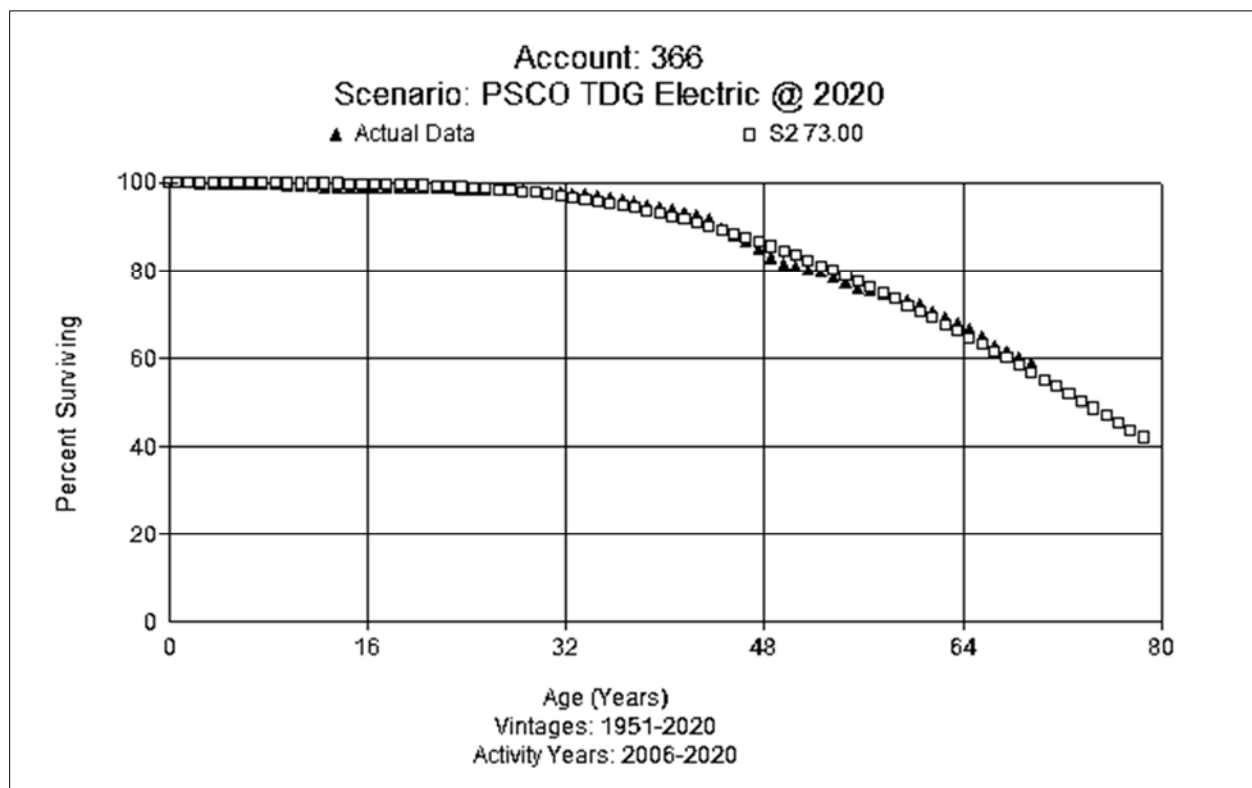


FERC Account 366.0 Underground Conduit (73 S2)

This account consists of underground conduit, duct banks, vaults, and ventilating system equipment. At December 31, 2020, there was approximately \$493.9 million in this account. The approved life is 70 years with an R3 dispersion pattern.

Discussions with Company personnel indicate that there is not much conduit, but it is primarily PVC or PE pipe, and occasionally transite pipe in the downtown area, which is always encased in concrete. Many of the assets in this account are located in downtown areas. Company expects conduit to last longer than conductor. Damage and relocation are the primary causes of retirement. In the last 7-8 years, a few new feeders have been installed in the existing conduit.

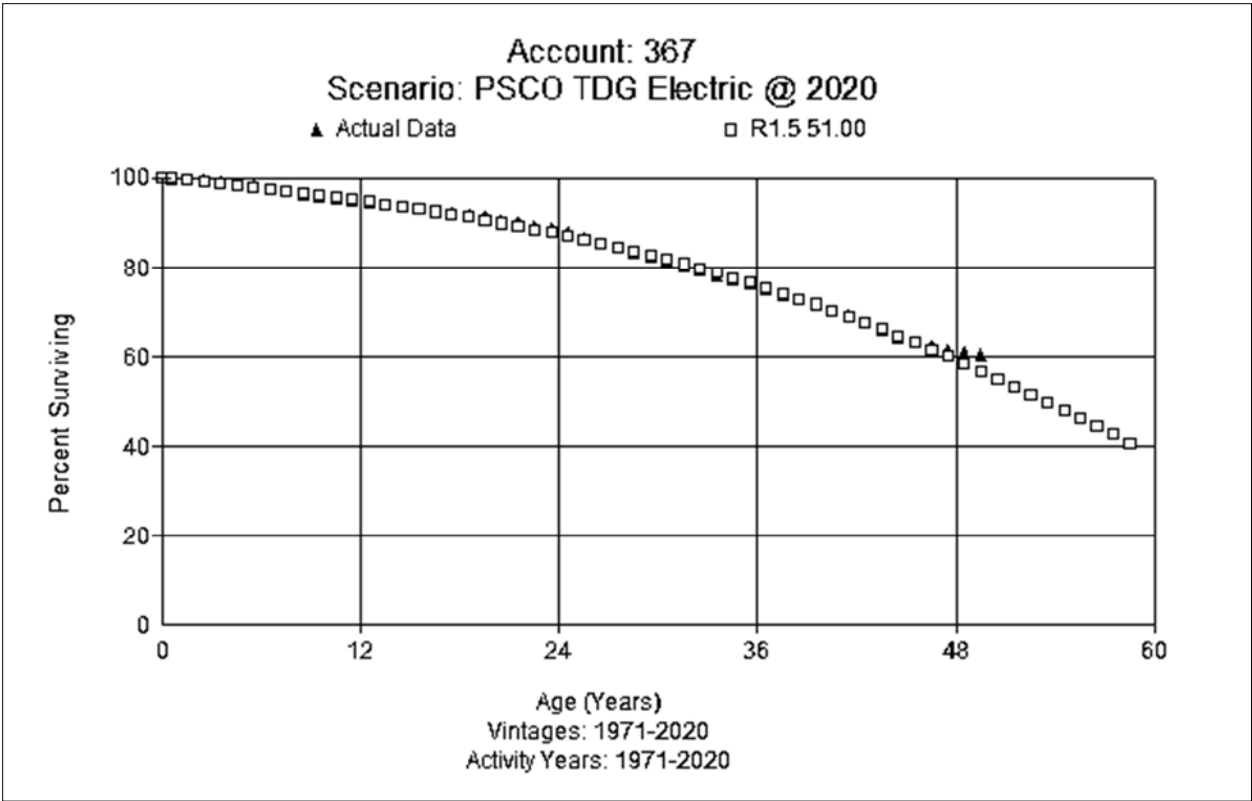
The actuarial analysis indicates a longer life than existing. The majority of fits across the bands analyzed indicate a life between 65-76 years. There has been a renewal of infrastructure that might affect the life to a small degree. Based on indications from the actuarial analysis, the type of assets in this account, and judgment, this Study recommends increasing to a 73-year life and moving to the S2 dispersion. A graph of the observed life table versus the proposed curve is shown below.



FERC Account 367.0 Underground Conductors & Devices (51 R1.5)

This account consists of underground conductor, switches, and switchgear for distribution plant. At December 31, 2020, there was approximately \$2.0 billion in this account. The currently approved life estimate is 47 years with the R1.5 dispersion curve. Discussions with Company personnel indicated the URG cable - cable cure program has been put on hold, but some work was completed. Early cable did not get the life expected, as it was lasting 25-40 years. Company expects the new cable, installed since mid-late 1990s, to last 40 years. TRXPLE does have a longer life than the earlier XLPE cable. There is still a lot of the older feeder cable in the field, possibly 1/3 of over 3000 miles originally. Residential URD UG cable has a portion not replaced yet. Downtown UG cable is paper-insulated lead covered (PILC), and the Company expects this particular type of cable to last longer. It has a proven track record compared to other, newer types of cable. The standard has changed to a rubber insulation cable for the Downtown network. Operationally, they would expect the life of this account to start increasing.

The actuarial analysis indicates a slightly longer life in the more recent bands, which supports the Company's operational expectations noted above. In the 1971 placement and 1971 experience band, a near perfect fit is seen with the 51 R1.5. Based on the analysis, Company input, the types of assets, and judgment, this Study recommends an increase in life to 51 years while retaining the R1.5 dispersion. A graph of the observed life table versus the proposed curve is shown below.

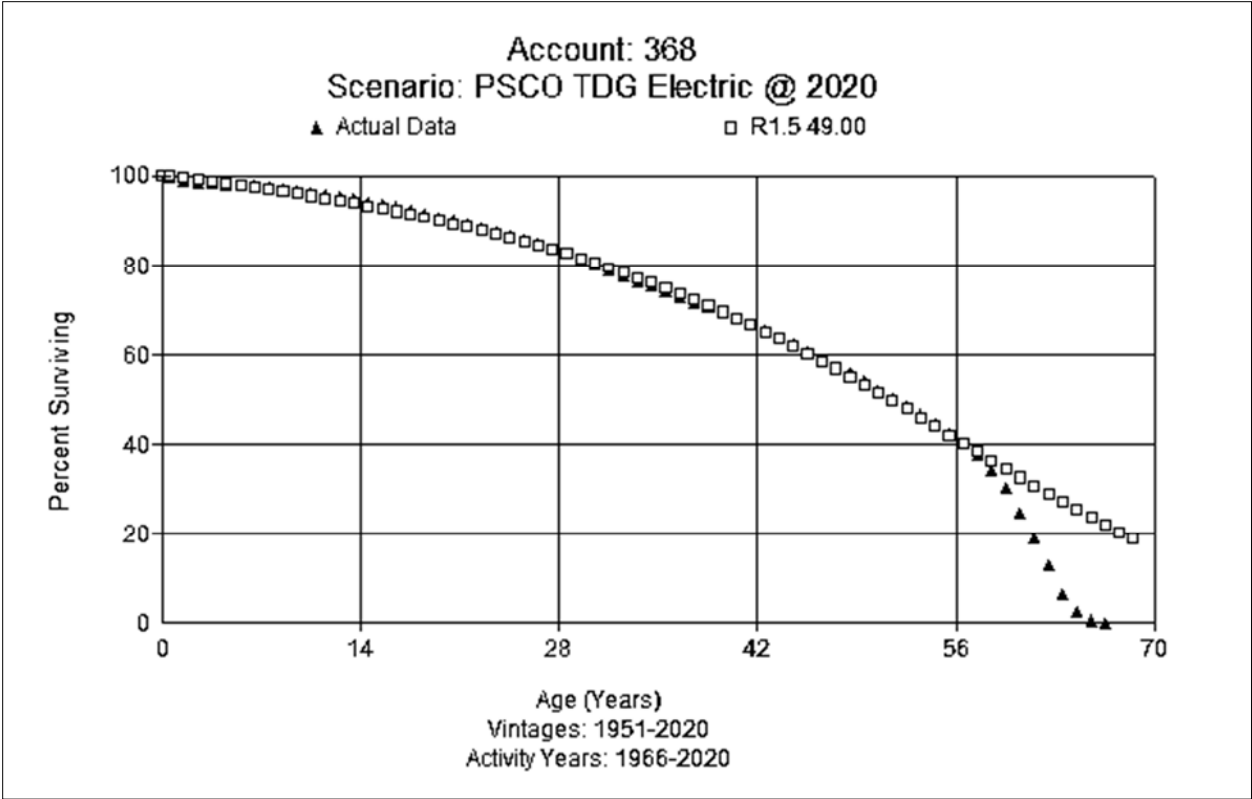


FERC Account 368.0 Line Transformers (49 R1.5)

This account consists of line transformers, regulators, and capacitors. At December 31, 2020, there was approximately \$631.4 million in this account. The current approved life for this account is 47 years with an R1.5 dispersion pattern.

Discussions with Company personnel indicated that line transformers will not last as long as conductor. Increasing load may cause the replacement of UG transformers. They would not expect a large difference in lives for OH and UG. OH transformers are subject to failure due to lightning, and UG has corrosion issues. The Company did a number of pad mount change-outs due to loads in the last few years. When upgrading lines, the Company will change out transformers too. The Company sees more changes due to loading rather than age and believes a transformer life of 40-50 years is reasonable. More recent transformers will run cooler due to DOE rules that require more metal in the transformers, which may have a slight lengthening of life.

The actuarial analysis indicates the majority of fits in the fuller bands to be between 47-50 years old. In the mid-placement and experience band, we see a perfect fit to 40 percent surviving with the R1.5 49. Based on the actuarial analysis, the type of assets in this account, Company input, and judgment, the Study recommends an increase in the life to 49-years while retaining the R1.5 dispersion. A graph of the observed life table versus the proposed curve is shown below.

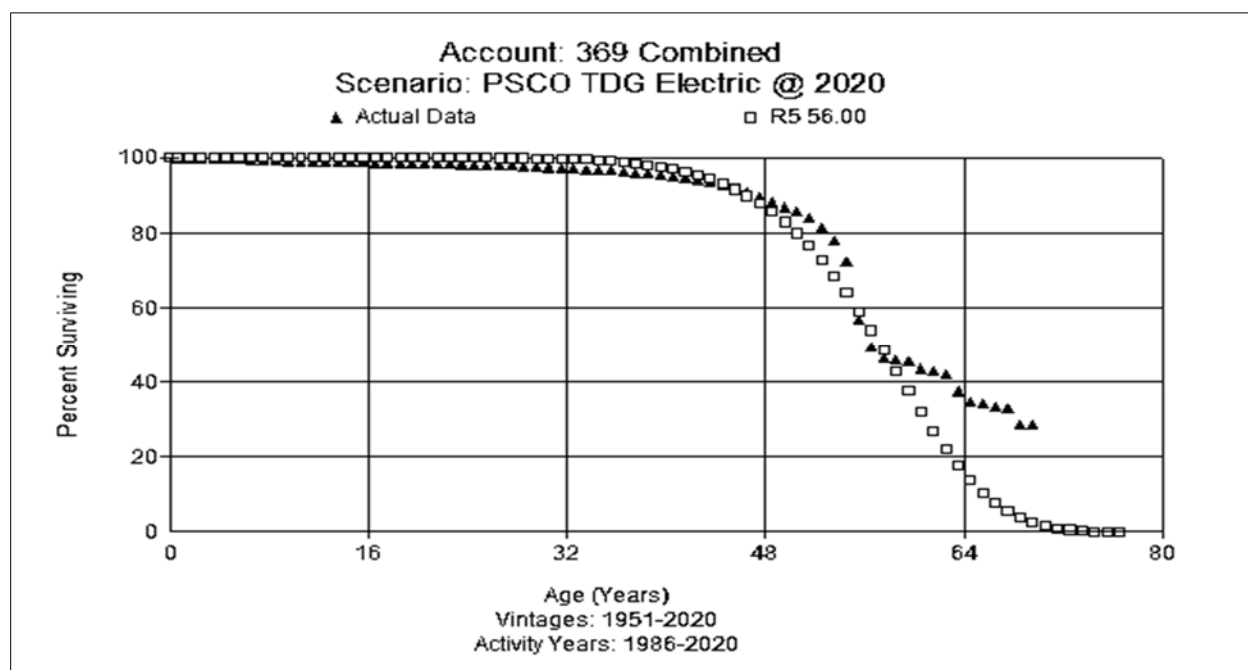


FERC Account 369.0, 369.1, and 369.2 Services (56 R5)

These accounts include electric services in buildings, both overhead and underground. At December 31, 2020, the combined balance in these accounts was approximately \$322.2 million. The current approved life for these accounts is 50 years with the R5 dispersion curve.

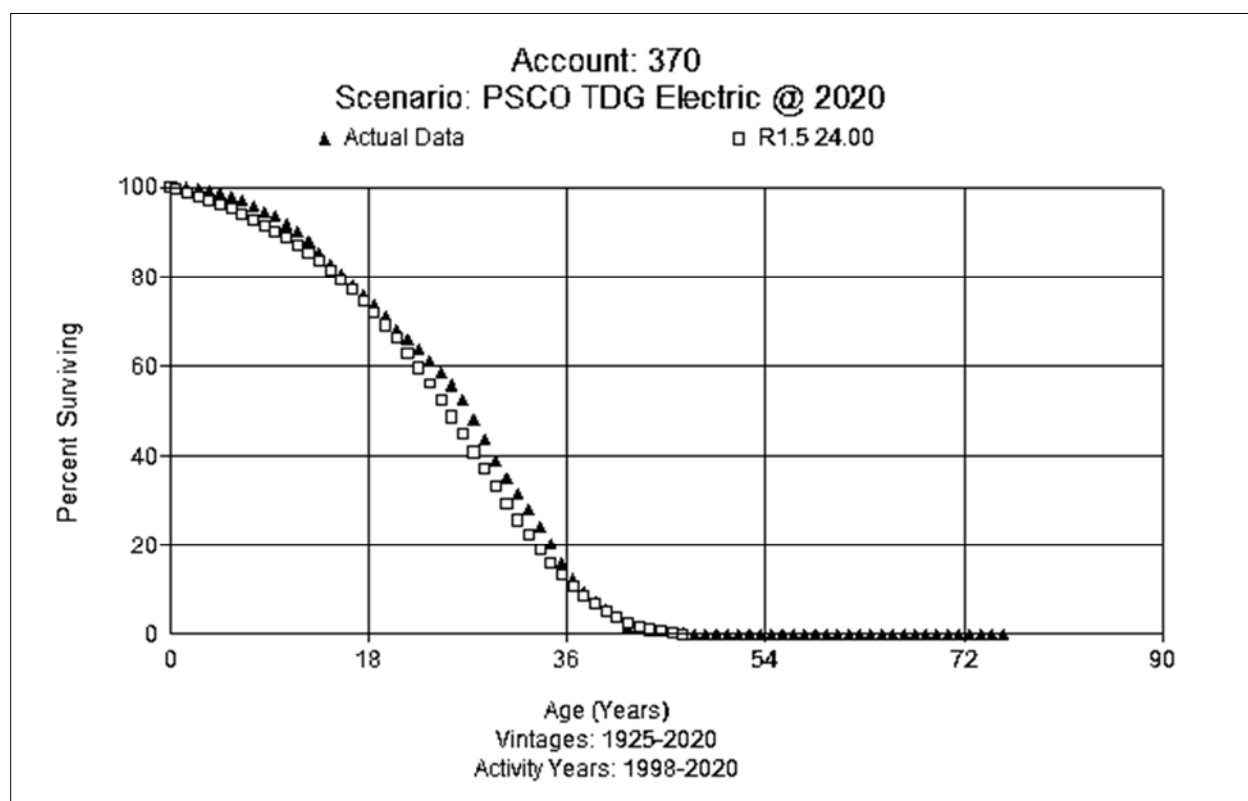
Discussions with Company personnel indicate they install Triplex conductor (XLPE) as their standard. Currently, UG services are 60-70% of its total services. Installation defects, load, relocations, and damage from third parties are drivers of replacement for UG services. Load and relocations are the primary drivers of retirement for OH services.

The three accounts 369.0, 369.1, and 369.2 were combined for the analysis. The analysis shows a steep pattern and a sharp decline in survivors around 55-56 years. Based on the analysis, type of assets, Company input, and judgment, the Study recommends moving to a 56-year life but retain the R5 dispersion. A graph of the observed life table versus the proposed curve is shown below.



FERC Account 370.0 Meters (24 R1.5)

This account includes all distribution meters, excluding Automatic Meter Reading (“AMR”) Meters. At December 31, 2020, there was approximately \$164.0 million in this account. The current approved life is 24 years with an R1.5 dispersion curve. Per instructions from the Company, this study retains the same life as current approved for this account. The graph below demonstrates how the proposed curve matches actual data for this account.



FERC Account 370.02 AGIS-AMI Equipment (20 SQ)

This account includes AMI equipment. At December 31, 2020, there was approximately \$8.6 million in this account. Currently this account is being depreciated using parameters for Account 370.2, 10 years with the S6 dispersion curve. This study proposes to assign a specific life for this equipment.

The AGIS (Advanced Grid Intelligence and Security) deployment will start later in 2021 and will replace all meters with AGIS meters. The deployment will take 3.5 years (through end of 2024). Pilot meters from 2019 (currently in 370020) will remain and the new AGIS meters will be added to that account. The 370020 account should be set to a 20-year life. The existing 370020 account will be used for the new AGIS meter account. They are moving to ITRON from L&G. Accounts 370000 Meters and 370065 (AMR equipment – ERTS) should both be frozen at the current depreciation rate and when the deployment is over, the Company will ask for regulatory treatment. No graph is provided.

FERC Account 370.2 AMR Equipment (10 S6)

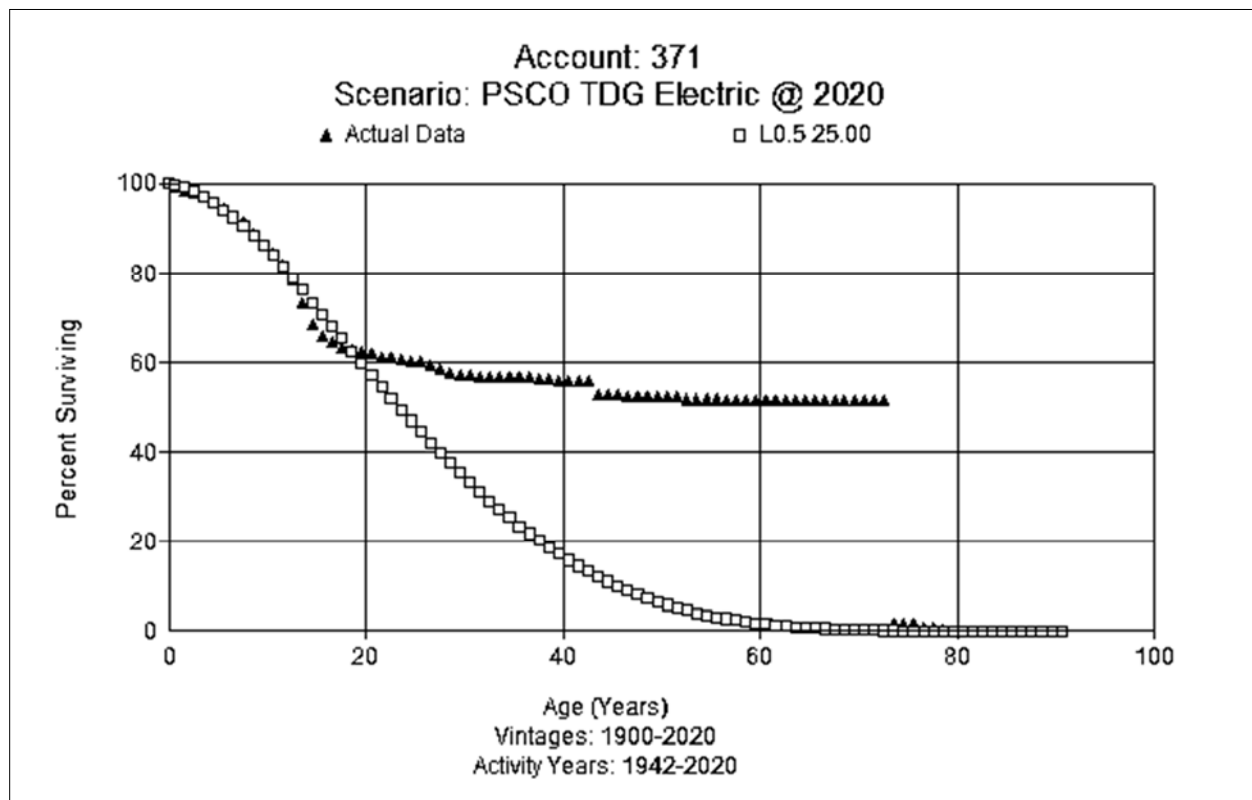
This account includes AMR equipment. At December 31, 2020, there was approximately \$71.7 million in the account. The current approved life is 10 years with the S6 dispersion curve. The Company began installing AMR in 1995-1996 as an attachment to existing electro-mechanical electric meters. If an electric meter was over 10 years old at time of retrofit, it was replaced with a new electric meter. With the proposed technology change for the equipment in this account, the Company instructed that the life of this account should remain at 10 years given that these assets are expected to soon be replaced with AMI meters. No graph is shown.

FERC Account 371.0 Installation on Customer Premises (25 L0.5)

This account consists of luminaire, pedestals, and wood poles. At December 31, 2020, there was approximately \$6.6 million in this account. The current approved life for this account is 25 years with the L0.5 dispersion pattern.

Discussions with the Company indicated the current investment is in luminaires. However, LED technology is available, and consideration of a program is possible.

The analysis produces a curve with a 25-year life to about 60 percent surviving and then the graph moves almost horizontal (the tail) to a much higher age. Based on the type of assets, moving the life much beyond 25 years is not reasonable and little weight is generally given to the tail of the curve. Based on the actuarial analysis, the type of assets in this account, and judgment, the current Study recommendation is to retain the approved 25 L0.5. A graph of the observed life table versus the proposed curve is shown below.



FERC Account 371.40 Installations on Customer's Premises-EV (proposed 10-year life amortized)

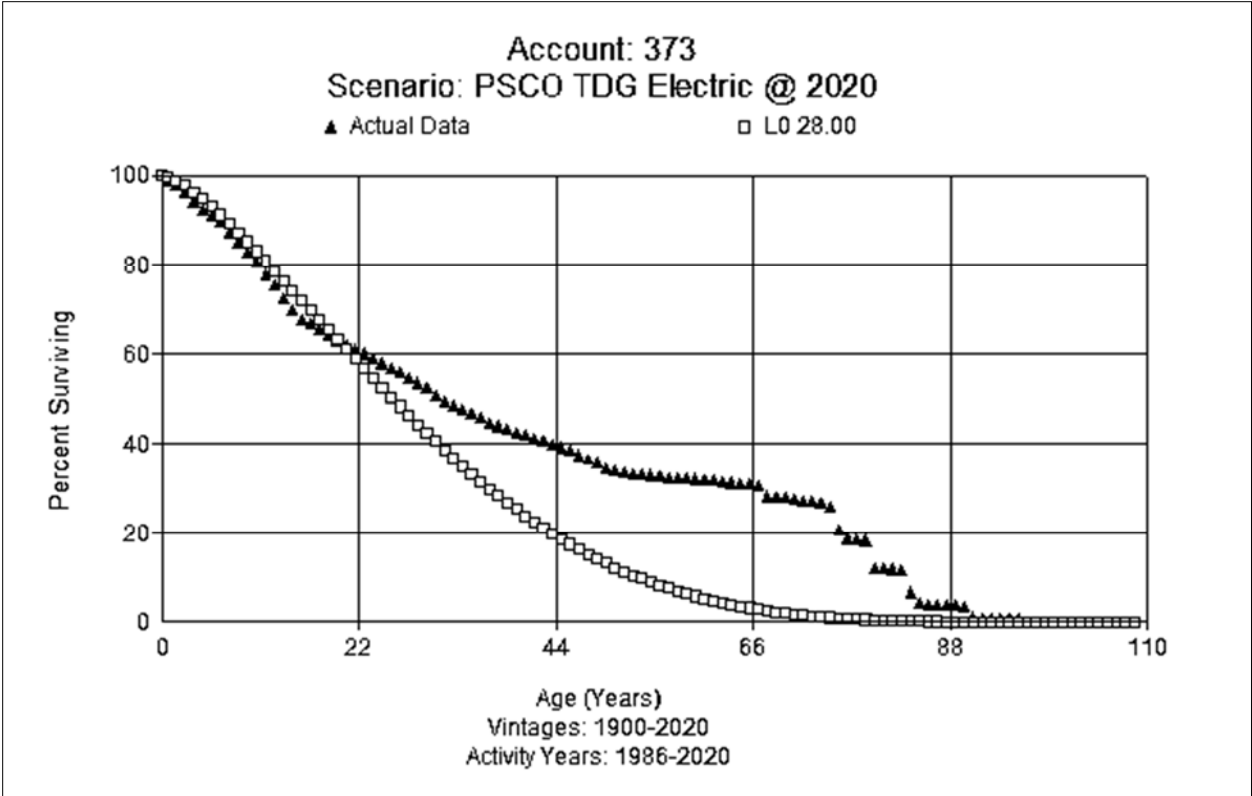
This account includes the service panel, the charge stub, and the wiring between the two for electric vehicles charging on customer's premises. This is a new account and there is currently no plant at December 31, 2020. Based on information from the Company, this study proposes a 10-year life and assets in this account will be amortized.

FERC Account 373.0 Street Lighting & Signal Systems (28 L0)

This account includes all distribution streetlights, conductor, conduit, luminaire, and standards. At December 31, 2020, there was approximately \$179.3 million in this account. The current approved life for this account is 41 years with the R0.5 dispersion curve.

Discussions with Company personnel indicated that they moved from Mercury Vapor to High Pressure Sodium (HPS) in 1980s, and there is no Mercury Vapor left but some Metal Halide (MH) are still on the system. A large portion of the lights have been converted to LED. There is a mixture of steel and fiberglass with some wood and aluminum. Public damage, corrosion, and relocations are the major drivers of retirements. When replacing the pole, the Company would replace everything except the foundation. Current design is paint over galvanized steel. Older painted steel was not galvanized. Conductor to streetlights have a shorter life. It was originally direct buried but recently moved to putting it in conduit. Road salts (specifically Magnesium Chloride (MgCl)) cause significant corrosion. The LED fixture will last at least 15 years. The driver (like an inverter) may be the part of the LED lamp that fails. HPS lights lasted longer and the bulbs were replaced on O&M. The Company expects around a 25-year life.

The analysis indicates that the life is shorter than existing. The majority of the fits range from 18-30 years across the bands analyzed. In the full band, the L0 28 is a good fit to 60 percent surviving before it begins to move longer. Based on fuller bands, the type of assets in this account, and judgment, the current Study recommendation is to move to the 28-year life and L0 dispersion curve. A graph of the observed life table versus the proposed curve is shown below.



ELECTRIC INTANGIBLE AND GENERAL PLANT

General Intangible Plant Accounts, FERC Accounts 303.00–303.14

General FERC Account 303.03 Miscellaneous Computer Software – 3 SQ

This account consists of miscellaneous computer software. There is currently no investment. The current approved life of 3 SQ should be retained.

General FERC Account 303.07 Miscellaneous Computer Software – 7 SQ

This account consists of miscellaneous computer software. The investment as of December 31, 2020 is \$74.9 million. The current approved life of 7 SQ should be retained.

General FERC Account 303.10 Miscellaneous Computer Software – 10 SQ

This account consists of miscellaneous computer software. The investment as of December 31, 2020 is \$67.2 million. The current approved life of 10 SQ should be retained.

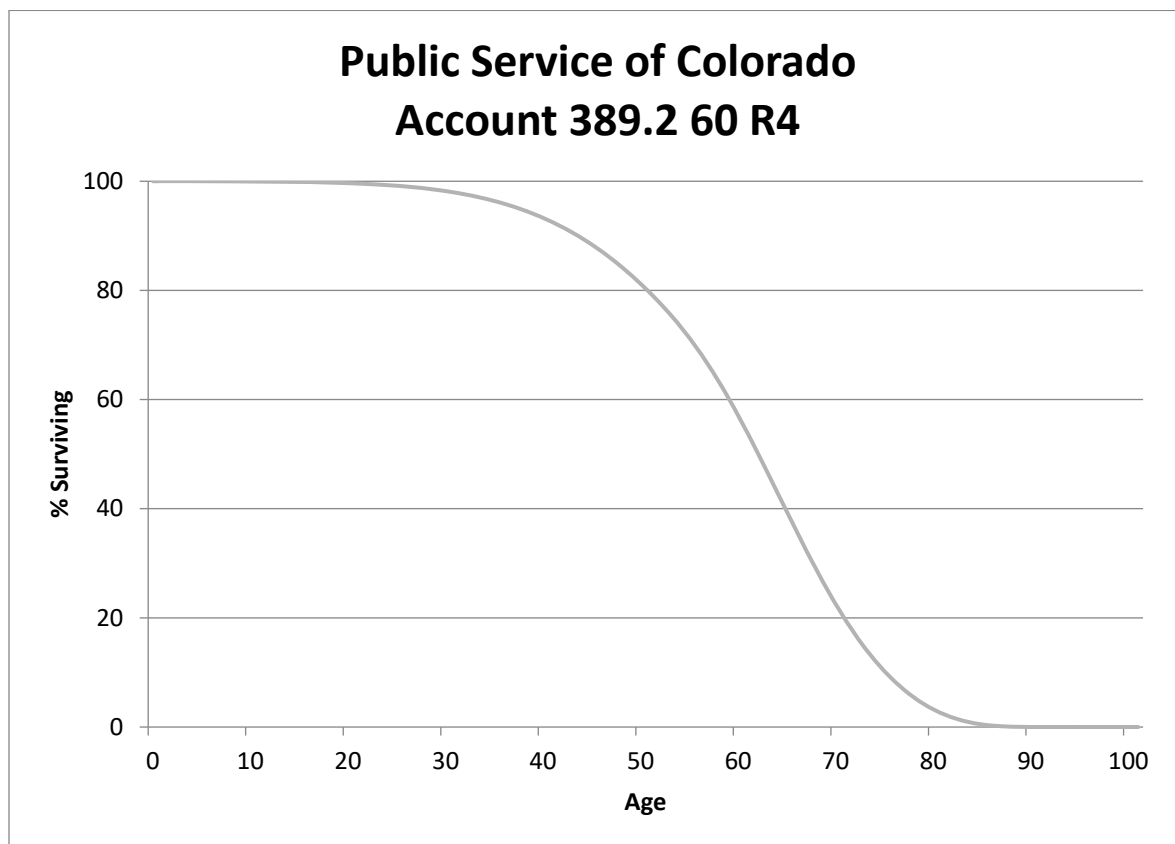
General FERC Account 303.15 Miscellaneous Computer Software – 15 SQ

This account consists of miscellaneous computer software. There is currently no investment. If assets are added to this account, this Study recommends a 15 SQ for this account.

Electric General Accounts, FERC Accounts 389.0–398.0

FERC Account 389.20 Land Rights (60 R4)

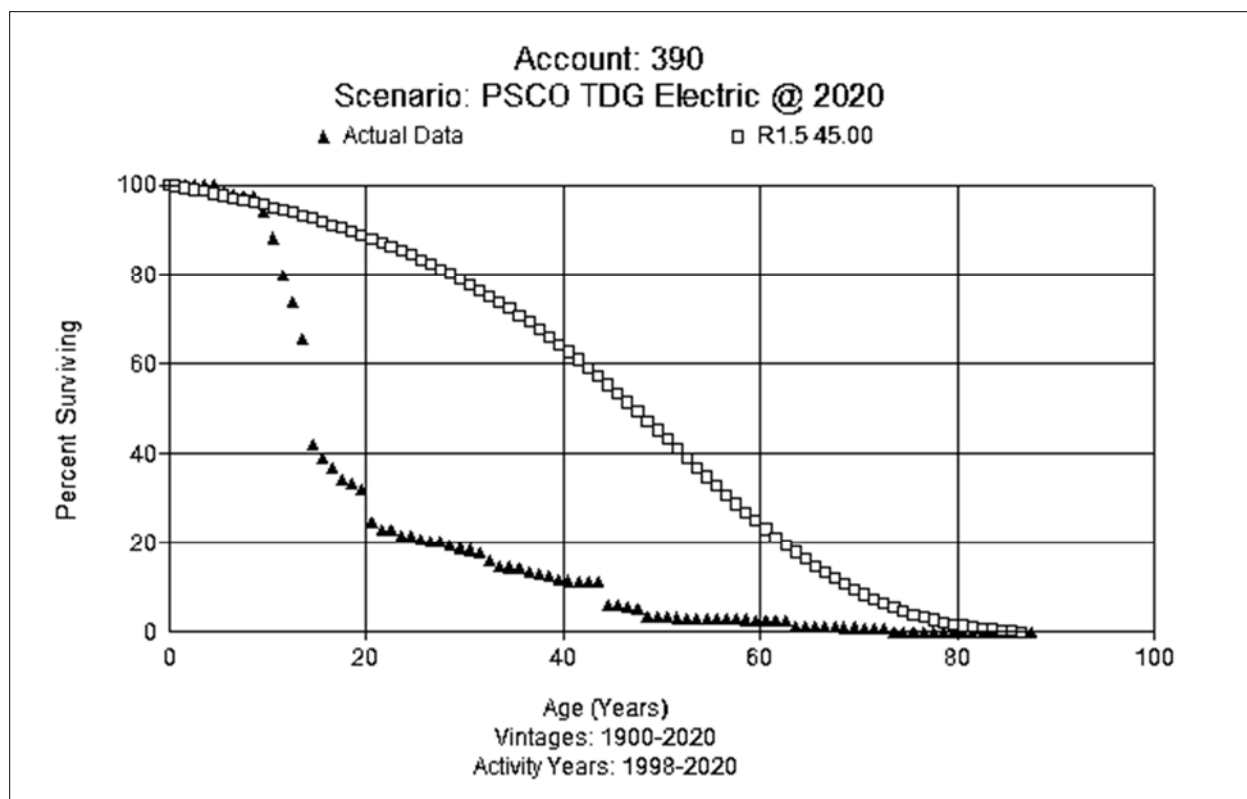
This account consists of land rights associated with office buildings, garages, warehouses, service centers, and other buildings used for general utility service. At December 31, 2020, there was no plant in this account. If assets are added into this account, this Study recommends a life of 60 years with an R4 dispersion. A generic curve shape is shown below.



FERC Account 390 All Structures & Improvements & Partitions (45 R1.5)

These accounts include the cost of buildings, yard improvements, and partitions used for utility service. At December 31, 2020, there was approximately \$11.9 million in this account. The current approved life and curves for the various sub accounts recorded to Account 390-Structures and Improvements is 45 R1.5.

A combined analysis was performed. The life analysis indicates a much shorter life than existing and what is expected for the types of assets in these accounts. Based on experience with PSCo Common, as well as considering the type and mix of assets and judgment, this Study recommends retention of the 45 R1.5. A graph of the observed life table versus the proposed curve is shown below.



Electric General FERC Accounts 391–398

PSCo adopted Vintage Group Amortization consistent with FERC Accounting Release No. 15 a number of years ago in CPUC Docket 06S-234EG. This process provides for the amortization of General plant in two parts: 1) amortize plant over the life as recommended in this Study, and 2) amortize an additional component to the accrual that includes an amount to allocate deficit or excess reserve (as necessary) as compared to the amount of reserve needed in the account at this point in its amortization. At the end of the amortized life, property will be retired from the books.

During the Study interview process, a review of the lives for each of the amortized accounts is performed to confirm the existing lives are still appropriate. In this study, the lives for several of the accounts have changed. This Study recommends the retirement of assets greater than the service life. A table of the accounts, plant balance after retirements, and the approved and proposed life is shown below. For details regarding the computations, please see Appendix A-1.

Table 1 - Electric General Plant Amortized

Account	Description	Plant	Approved Life	Proposed Life
		Balance 12/31/2020		
391	Office Furniture and Equipment	\$ 7,383,571	20	20
391.2	Computer Hardware	27,086,580	6	6
392.1	Transportation Equipment - Automobiles	840,264	12	7
392.2	Transportation Equipment - Light Trucks	22,354,695	12	7
392.3	Transportation Equipment - Trailers	7,636,594	25	15
392.4	Transportation Equipment - Heavy Trucks	48,610,693	14	10
393	Stores Equipment	156,423	30	30
394	Tools, Shop and Garage Equipment	46,857,007	25	15
395	Laboratory Equipment	1,960,327	10	10
396	Power Operated Equipment	6,185,929	14	10
397	Communication Equipment	188,676,455	15	15
398	Miscellaneous Equipment	1,565,744	20	20

COMMON UTILITY PLANT

Common Intangible Plant Accounts, FERC Accounts 303.00 – 303.14

For accounts in this function, the SQ dispersion pattern is recommended and no graph is presented.

FERC Account 303.00 Miscellaneous Computer Software – 3 SQ

This account consists of miscellaneous computer software. The investment as of December 31, 2020 is \$14.4 million in this account. The approved life of 3 SQ should be retained.

FERC Account 303.07 Miscellaneous Computer Software – 7 SQ

This account consists of miscellaneous computer software. The investment as of December 31, 2020 is \$200.8 million. The approved life of 7 SQ should be retained.

FERC Account 303.10 Miscellaneous Computer Software – 10 SQ

This account consists of miscellaneous computer software. The investment as of December 31, 2020 is \$9.9 million. The approved life of 10 SQ should be retained.

FERC Account 303.15 Miscellaneous Computer Software – 15 SQ

This account consists of miscellaneous computer software. The projected investment as of December 31, 2020 is \$156.9 million. The approved life of 15 SQ should be retained.

COMMON GENERAL PLANT

Common General Plant Accounts, FERC Accounts 389.0–398.0

Accounts 391–398 in this function are recommended for general plant amortization. The SQ dispersion pattern is recommended and no curve is presented.

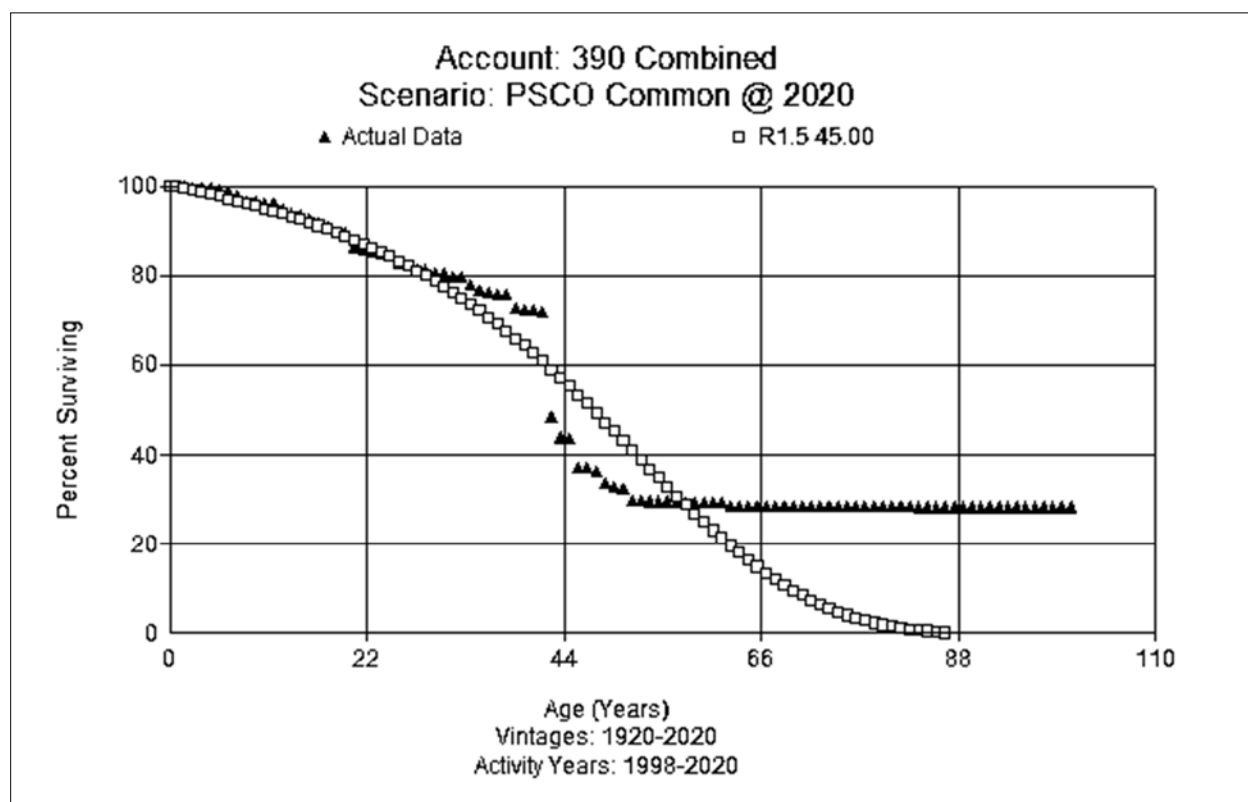
FERC Account 389.20 Land Rights (60 R4)

This account consists of land rights associated with office buildings, garages, warehouses, service centers, and other buildings used for general utility service. As of December 31, 2020, there was no plant in this account. This Study recommends retention of the existing 60 R4. See the graph provided for Account 389.2 General Land Rights.

FERC Account 390.00 General Structures & Improvements (45 R1.5)

This account consists of office buildings, garages, warehouses, service centers, and other buildings used for general utility service. As of December 31, 2020, there was \$188.7 million in this account. The current approved life and curve for the various sub accounts recorded to Account 390-Structures and Improvements is 45 R1.5.

A combined analysis was performed. The life analysis indicates a life consistent with the existing and what is expected for the types of assets in these accounts. Based on experience, as well as considering the type and mix of assets and judgment, this Study recommends retention of the 45 R1.5. A graph of the observed life table versus the proposed curve is shown below.



Common General FERC Accounts 391–398

PSCo adopted Vintage Group Amortization consistent with FERC Accounting Release No. 15 a number of years ago in CPUC Docket 06S-234EG. This process provides for the amortization of General plant in two parts: 1) amortize plant over the life as recommended in this Study, and 2) amortize an additional component to the accrual that includes an amount to allocate deficit or excess reserve (as necessary) as compared to the amount of reserve needed in the account at this point in its amortization. At the end of the amortized life, property will be retired from the books.

During the Study interview process, a review of the lives for each of the amortized accounts is performed to confirm the existing lives are still appropriate. In this study, the lives for several of the accounts have changed. This Study recommends the retirement of assets greater than the service life. A table of the accounts, plant balance after retirements, and the approved and proposed life is shown below. For details regarding the computations, please see Appendix A-2.

Table 2 - Common Plant Amortized

Account	Description	Plant	Approved Life	Proposed Life
		Balance 12/31/2020		
391.00	Office Furniture and Equipment	\$ 27,998,991	20	20
391.04	Computer Hardware	164,689,127	6	6
392.10	Transportation Equipment - Automobiles	1,960,152	12	7
392.20	Transportation Equipment - Light Trucks	4,784,685	12	7
392.30	Transportation Equipment - Trailers	3,130,101	25	15
392.40	Transportation Equipment - Heavy Trucks	2,678,588	14	10
393.00	Stores Equipment	176,743	30	30
394.00	Tools and Shop Equipment	4,915,706	25	15
395.00	Laboratory Equipment	228,526	10	10
396.00	Power Operated Equipment	618,532	14	10
397.00	Communication Equipment	58,899,366	15	15
398.00	Miscellaneous Equipment	280,476	20	20

NET SALVAGE ANALYSIS

When a capital asset is retired, physically removed from service, and finally disposed of, terminal retirement is said to have occurred. The residual value of a terminal retirement is called gross salvage. Net salvage is the difference between the gross salvage (what the asset was sold for) and the removal cost (cost to remove and dispose of the asset).

Gross salvage and cost of removal related to retirements are recorded to the general ledger in the accumulated provision for depreciation at the time retirements occur within the system.

Net salvage data by plant account for Transmission, Distribution, and General Property plant is shown in Appendix E. Removal cost percentages are calculated by dividing the current cost of removal by the original installed cost of the asset. Some plant assets can experience significant negative removal cost percentages due to the timing of the addition versus the retirement. For example, a Transmission asset in FERC Account 355 with a current installed cost of \$500 (2021) would have had an installed cost of \$42.86² in 1959. A removal cost of \$50 for the asset calculated (incorrectly) on current installed cost would only have a negative 10 percent removal cost (\$50/\$500). However, a correct removal cost calculation would show a negative 117 percent removal cost for that asset (\$50/\$42.86). Inflation from the time of installation of the asset until the time of its removal must be considered in the calculation of the removal cost percentage because the depreciation rate, which includes the removal cost percentage, will be applied to the original installed cost of assets.

² Using the Handy-Whitman Bulletin No. 193, E-5, line 36, $\$42.86 = \$500 \times 51/595$.

Net Salvage - Steam Production and Other Production Property

The concept behind the net salvage cost component of depreciation rates for power plants is different from that of Transmission or Distribution assets. Power plants are discrete units that will need to be dismantled after the end of their useful lives. Because of this, instead of statistically analyzing the historical cost for salvaging and removing assets with rolling and shrinking bands, engineering studies are conducted to determine the cost to dismantle the individual units or plants.

The current net salvage rates were established in Docket No. 19AL-0268E. The approved net salvage incorporates dismantling costs for PSCo facilities from a 2016 Dismantling Study. This depreciation study updates the projected dismantling costs with results from the Production Plant Dismantling Cost Study for PSCo that was performed by Burns & McDonnell Engineering Company, Inc. ("Burns & McDonnell").

The 1898 & CO. 2020 Decommissioning Cost Study was utilized in this Study to arrive at the terminal net salvage amounts. The total Steam, Hydro, and Other Production terminal removal cost in the 2020 1898 & CO. Production Dismantling Cost Study less GSU and related costs for each plant and unit were allocated to each FERC Plant Account for the unit. See Appendix G for a detailed computation reconciling the 1898 & CO. 2020 Decommissioning Study to the PSCo Dismantling Costs or Terminal Net Salvage amounts by unit by FERC plant account. This Study utilizes a total net salvage amount and calculates a total net salvage percent, which combines both the interim and terminal net salvage in developing the proposed depreciation rates for all production plant. The proposed net salvage rates in total are more negative than what is included in the approved depreciation rates. The total net salvage cost was divided by the depreciable investment at that plant, unit, and FERC Account to create a total net salvage percentage for that particular plant unit and FERC Account. The demolition cost for each plant was combined with the interim removal cost based on each interim net salvage analyses for Accounts 311-316, Accounts 331-336, and Accounts 341-346 to model total Steam, Hydro, and Other Production, as well as the pro-forma plant additions that will occur in 2021 and 2022.

The interim net salvage history for each plant account is shown in Appendix E-1. The allocated dismantling costs by generating unit and account are also shown in

Appendix G and then combined with interim net salvage to develop total net salvage percentages. The calculations of the individual plant, by account, total net salvage percentages are shown in Appendix G.

INTERIM NET SALVAGE STEAM PRODUCTION

FERC Account 311.0 Structures and Improvements (Negative 20 percent)

This account consists of any gross salvage or removal cost associated with buildings, structures, fences, lighting systems, and other related assets at each power plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 20 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -298.31 and -98.55 percent respectively. Based on history and judgment, this study recommends retaining the negative 20 percent for interim net salvage for this account.

FERC Account 312.0 Boiler Plant Equipment (Negative 15 percent)

This account consists of any gross salvage or removal cost associated with boiler plant equipment, bag houses, preheaters, and other related equipment. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 15 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -18.99 and -25.20 percent respectively. Based on history and judgment, this study recommends retention of negative 15 percent for interim net salvage for this account.

FERC Account 312.0 Boiler Plant Equipment AQIR (0 percent)

This account consists of air quality control systems and other related equipment. Interim net salvage was approved in Docket No. 19AL-0268E and is zero percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of zero and -3.48 percent respectively. Based on history and judgment, this study recommends retention of zero percent for interim net salvage for this account.

FERC Account 312.061 Coal Cars (0 percent)

This account includes the cost of coal cars used in producing electricity at the steam generating sites. Interim net salvage was approved in Docket No. 19AL-0268E and is zero percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of zero and 93.01 percent respectively. Based on history and

judgment, this study recommends retention of zero percent for interim net salvage for this account.

FERC Account 314.0 Turbogenerator Equipment (Negative 15 percent)

This account consists of any gross salvage or removal cost associated with turbogenerator equipment, stationary blades, turbine control systems, and other related assets at each power plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 15 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a -17.95 and -26.15 percent respectively. Based on history and judgment, this study recommends retention of negative 15 percent for interim net salvage for this account.

FERC Account 315.0 Accessory Electric Equipment (Negative 10 percent)

This account consists of any gross salvage or removal cost associated with power transformer, regulators, and related assets at each power plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 10 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -14.36 and -20.17 percent respectively. Based on history and judgment, this study recommends retention of negative 10 percent for interim net salvage for this account.

FERC Account 315.2 Computers and Peripherals (0 percent)

This account consists of computers, peripherals, and station control related assets at each plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 0 percent. Appendix E-1 shows the most recent five- and ten-year bands to be zero and -31.10 percent respectively. Based on history and judgment, this study recommends retention of zero percent for interim net salvage for this account.

FERC Accounts 316.0 Miscellaneous Power Plant Equipment (Negative 5 percent)

This account consists of any gross salvage or removal cost associated with tanks, pumps, work equipment, and other related assets at each power plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 5 percent. Appendix

E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -26.79 and -17.14 percent respectively. Based on history and judgment, this study recommends retention of negative 5 percent for interim net salvage for this account.

INTERIM NET SALVAGE HYDRAULIC (HYDRO) PRODUCTION

FERC Account 331.0 Structures and Improvements (Negative 10 percent)

This account consists of any gross salvage or removal cost associated with buildings, structures, fences, lighting systems, and other related assets at each plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 10 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -35.78 and -41.68 percent respectively. Based on history and judgment, this study recommends retention of negative 10 percent for interim net salvage for this account.

FERC Account 332.0 Reservoirs, Damns and Waterways (Negative 10 percent)

This account consists of any gross salvage or removal cost associated with dams, penstocks, spillways, hoists, foundations, intakes, and other related equipment. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 10 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -7.85 and -30.07 percent respectively. Based on history and judgment, this study recommends retention of negative 10 percent for interim net salvage for this account.

FERC Account 333.0 Waterwheels, Turbines and Generators (Negative 10 percent)

This account consists of any gross salvage or removal cost associated with pumps, generators, turbines, valves, and other related assets at each plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 10 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -236.89 and -164.74 percent respectively. Based on history and judgment, this study recommends retention of negative 10 percent for interim net salvage for this account.

FERC Account 334.0 Accessory Electric Equipment (Negative 10 percent)

This account consists of any gross salvage or removal cost associated with generators, control systems, exciter, pumps, turbines, valves, and related assets at each plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 10 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -9.29 and -19.21 percent respectively. Based on history and judgment, this study recommends retention of negative 10 percent for interim net salvage for this account.

FERC Account 334.2 Computers and Peripherals (0 percent)

This account consists of any gross salvage or removal cost associated with computers, peripherals, and station control related assets at each plant. Interim net salvage was approved in Docket No. 19AL-0268E and is zero percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of zero percent. Based on history and judgment, this study recommends retention of zero percent for interim net salvage for this account.

FERC Accounts 335.0 Miscellaneous Power Plant Equipment (Negative 5 percent)

This account consists of any gross salvage or removal cost associated with station controls, pumps, work equipment, and other related assets at each plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 5 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -24.08 and -55.42 percent respectively. Based on history and judgment, this study recommends retention of negative 5 percent for interim net salvage for this account.

FERC Accounts 335.2 Recreational Facilities (Negative 5 percent)

This account consists of any gross salvage or removal cost associated with yard improvements at each plant. Interim net salvage was approved in Docket No. 19AL-0268E and is negative 5 percent. Appendix E-1 shows the most recent five- and ten-year

bands to be a net salvage percentage of zero percent. Based on the expectation for some removal cost and judgment of Account 335.0, this study recommends retention of negative 5 percent for interim net salvage for this account.

FERC Accounts 336.0 Miscellaneous Power Plant Equipment (0 percent)

This account consists of any gross salvage or removal cost associated with bridges, road, and yard improvements at each plant. Interim net salvage was approved in Docket No. 19AL-0268E and is zero percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -1.38 percent. Based on history and judgment, this study recommends retention of zero percent for interim net salvage for this account.

INTERIM NET SALVAGE OTHER PRODUCTION

FERC Account 341.0 Structures and Improvements (Negative 20 percent)

This account consists of any gross salvage or removal cost associated with buildings, structures, fences, lighting systems, and other related assets at each power plant. Interim net salvage was approved in Docket No. 19AL-0268E and is a negative 20 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -103.25 and -20.58 percent respectively. Based on history and judgment, this study recommends retention of negative 20 percent for interim net salvage for this account.

FERC Account 342.0 Fuel Holders and Accessory Equipment (Negative 5 percent)

This account consists of any gross salvage or removal cost associated with pumps, storage tanks, natural gas/fuel oil piping, and other related assets at each power plant. Interim net salvage was approved in Docket No. 19AL-0268E and is a negative 5 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -155.85 and -38.81 percent respectively. Based on history and judgment, this study recommends retention of negative 5 percent for interim net salvage for this account.

FERC Account 343.0 Prime Movers (Negative 10 percent)

This account consists of any gross salvage or removal cost associated with foundations, chimneys, demineralizers, fire protection systems, and other related assets at each power plant. Interim net salvage was approved in Docket No. 19AL-0268E and is a negative 10 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -13.12 and -89.91 percent respectively. Based on history and judgment, this study recommends retention of negative 10 percent for interim net salvage for this account.

FERC Account 344.0 Generators (Negative 10 percent)

This account consists of any gross salvage or removal cost associated with generators and other related assets at each power plant. Interim net salvage was

approved in Docket No. 19AL-0268E and is a negative 10 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -4.29 and -11.54 percent respectively. Based on history and judgment, this study recommends retention of negative 10 percent for interim net salvage for this account.

FERC Account 345.0 Accessory Electric Equipment (Negative 10 percent)

This account consists of any gross salvage or removal cost associated with power transformer, regulators, and related assets at each power plant. Interim net salvage was approved in Docket No. 19AL-0268E and is a negative 10 percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of -14.76 and -13.10 percent respectively. Based on history and judgment, this study recommends retention of negative 10 percent for interim net salvage for this account.

FERC Account 345.2 Computers and Peripherals (0 percent)

This account consists of any gross salvage or removal cost associated with computers, peripherals, and station control related assets at each plant. Interim net salvage was approved in Docket No. 19AL-0268E and is zero percent. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of a -6.09 and -5.95 percent. Based on history and judgment, this study recommends retention of zero percent for interim net salvage for this account.

FERC Account 346.0 Miscellaneous Power Plant Equipment (Negative 10 percent)

This account consists of any gross salvage or removal cost associated with work equipment, test equipment, pumps, fire protection systems, and other related assets at each power plant. Interim net salvage was approved in Docket No. 19AL-0268E and is a negative 10 percent. Appendix E-1 shows the most recent five- and ten-year bands show a net salvage percentage of -50.87 and -52.69 percent respectively. Based on history and judgment, this study recommends negative 10 percent for interim net salvage for this account.

INTERIM NET SALVAGE WIND PRODUCTION

PSCo has added two wind farms to its other production function: Cheyenne Ridge and Rush Creek. As of December 31, 2020, Cheyenne Ridge had a total plant investment of \$654.8 million and Rush Creek had \$897.5 million. Accrual rates were requested for Rush Creek in Docket No. 16A-117E and for Cheyenne Ridge in Docket No. 18A-905E. The Company has limited experience with wind assets in the Ponnequin plant, which retired in 2015. The results for wind accounts separated from other production are shown in Appendix E-1.

FERC Account 341.045 Structures and Improvements (0 percent)

This account consists of any gross salvage or removal cost associated buildings, structures, fences, lighting systems, and other related assets at each wind farm. Accrual rates were requested Rush Creek in Docket No. 16A-117E and for Cheyenne Ridge in Docket No. 18A-905E with no interim net salvage requested. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of zero percent. Based on history and judgment, this study recommends a zero percent for interim net salvage for this account.

Account 342.045 Fuel Holders, Producers, and Accessories (0 percent)

This account consists of any gross salvage or removal cost associated fuel holders and accessories. Accrual rates were requested Rush Creek in Docket No. 16A-117E and for Cheyenne Ridge in Docket No. 18A-905E with no interim net salvage requested. There is no historical activity for this account. Based on judgment, this study recommends a zero percent for interim net salvage for this account.

FERC Account 344.045 Generators (Negative 10 percent)

This account consists of any gross salvage or removal cost associated generators, control systems, and other related assets at each wind farm. Accrual rates were requested Rush Creek in Docket No. 16A-117E and for Cheyenne Ridge in Docket No. 18A-905E with no interim net salvage requested. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of zero and -12.76 percent

respectively. Based on history and judgment, this study recommends negative 10 percent for interim net salvage for this account.

FERC Account 345.045 Accessory Electric Equipment (Negative 5 percent)

This account consists of any gross salvage or removal cost associated station controls, motor control center, station wiring, fire protection system, power supply, regulators, and related assets at each wind farm. Accrual rates were requested Rush Creek in Docket No. 16A-117E and for Cheyenne Ridge in Docket No. 18A-905E with no interim net salvage requested. Appendix E-1 shows the most recent five- and ten-year bands to be a net salvage percentage of zero and -7.33 percent respectively. Based on history and judgment, this study recommends negative 5 percent for interim net salvage for this account.

FERC Accounts 346.045 Miscellaneous Power Plant Equipment (0 percent)

This account consists of any gross salvage or removal cost associated instruments for air systems, work equipment, test equipment, pumps, fire protection systems, and other related assets at each wind farm. Accrual rates were requested Rush Creek in Docket No. 16A-117E and for Cheyenne Ridge in Docket No. 18A-905E with no interim net salvage rate requested. There is no history associated with miscellaneous equipment for wind assets. Based on judgment, this study recommends 0 percent for interim net salvage for this account.

INTERIM NET SALVAGE PROFORMA SOLAR PRODUCTION

PSCo intends to add solar production units to its production portfolio, and they are planned to go into operation in 2021. The Study recommendations are based on current industry expectations for these types of assets. See Appendix A-3 for the rate calculations and Appendix C-1 for the interim retirement and interim net salvage parameters.

FERC Account 341.0 Structures and Improvements (0 percent)

This account consists of any gross salvage or removal cost associated buildings, structures, fences, lighting systems, and other related assets at each solar facility. No interim parameters were used in the three-case settlement reached back in 2016 for the 2017-19 RES Plan. Therefore, interim net salvage for this account is zero percent.

FERC Account 342.0 Fuel Holders, Producers, and Accessories (0 percent)

This account consists of any gross salvage or removal cost associated fuel holders and accessories and other related assets at each solar facility. No interim parameters were used in the three-case settlement reached back in 2016 for the 2017-19 RES Plan. Therefore, interim net salvage for this account is zero percent.

FERC Account 344.0 Generators (0 percent)

This account consists of any gross salvage or removal cost associated generators, control systems, and other related assets at each solar facility. No interim parameters were used in the three-case settlement reached back in 2016 for the 2017-19 RES Plan. Therefore, interim net salvage for this account is zero percent.

FERC Account 345.0 Accessory Electric Equipment (0 percent)

This account consists of any gross salvage or removal cost associated station controls, motor control center, station wiring, fire protection system, power supply, regulators, and related assets at each solar facility. No interim parameters were used in the three-case settlement reached back in 2016 for the 2017-19 RES Plan. Therefore, interim net salvage for this account is zero percent.

FERC Accounts 346.0 Miscellaneous Power Plant Equipment (0 percent)

This account consists of any gross salvage or removal cost associated Instruments for air systems, work equipment, test equipment, pumps, fire protection systems, and other related assets at each solar facility. No interim parameters were used in the three-case settlement reached back in 2016 for the 2017-19 RES Plan. Therefore, interim net salvage for this account is zero percent.

INTERIM NET SALVAGE PROFORMA OTHER PRODUCTION – Manchief Plant

PSCo intends to purchase an additional plant Manchief in 2022. However, as of December 31, 2020 there is no investment. No interim parameters were requested in Docket No. 19A-409E for the Manchief Plant. This study reflects zero percent interim net salvage as existing. However, due to the similarity of assets, the Study is recommending the use of the same interim net salvage for the accounts shown and discussed above for Other Production. See Appendix A-3 for the rate calculations and Appendix C-1 for the Interim Retirement Parameters.

NET SALVAGE - TRANSMISSION PROPERTY

The cost of demolition and removal of transmission assets has increased over time due to several general factors including:

Time Value of Money

Many transmission assets have a life cycle of 40 years or more. Some of the assets being removed were installed over 40 years ago when materials and labor were simply cheaper.

Environmental Regulations and Right-of-Way Access/Use Restrictions

The cost of demolition has increased due to the continual evolution of environmental regulations affecting mitigation and restoration measures required during and after transmission line projects. This environmental rigor was not in-place at the time of the assets' initial installations. Consequently, assets located on difficult terrain or in sensitive locations require additional equipment, labor, and other expenses to ensure compliance during and after construction. Post-construction restoration may span several growing seasons to achieve necessary vegetation and site stability required for permit compliance.

Environmental protections also affect the salvage value of material. Wood poles that were once sold for a positive salvage value now cost the company to dispose of the poles due to the wood protectant materials like creosote.

Change in NERC and FERC requirements

Increased regulation and requirements on operating and planning standards may require assets be removed before they are fully depreciated. An example is the clearance of transmission lines. Xcel Energy had to remove portions of existing transmission lines and replace with taller structures due to clearance violations that were found in response to NERC's FAC008.

Labor

In the last decade, investment in the transmission system has increased substantially across the country. This has created a high demand for the limited number of qualified resources available to construct the work. The increases in capital expenditures are such that utilities now have to augment their internal workforces with external contract construction providers, who often come at a higher cost.

Safety Requirements

The industry has become intolerant of unsafe working practices. The robust equipment and stringent safety provisions required today have changed substantially from that of 40 years ago. Safety and compliance are core values for Xcel Energy and that may result is an increase in the cost of doing business.

Increase Financial Controls

Over time, financial standards and regulations have increased. Xcel Energy has adopted the best practices and incorporated cost and quality controls measures into the close out of construction work orders. This provides greater details of costs associated with demolition work compared to several years prior. As can be seen with the query of accounts, RWIP varies year by year, but the information collected has improved since 2007 after the 2007 RWIP Audit. RWIP has substantially increased since 2007.

Salvage Value

Many of the assets that are removed do not carry a high salvage value. Some of the assets may be sold as scrap but it would not amount to the cost of installation or offset the removal costs. Assets that can be reused are placed into inventory instead of being sold. In several cases, the assets being removed are of wood construction, in which case there is no salvage value.

Asset Renewal

Utilities across the nation are now dealing with aging, antiquated transmission infrastructure. It is now a necessity for utilities to have proactive asset renewal programs to replace transmission assets before they fail. The frequency of projects requiring removal of existing assets has increased substantially over the last decade, and will continue to increase into the future.

PSCo implemented the Wildfire Mitigation Plan in 2019. This plan increased the number of asset renewal projects done in rugged/mountainous terrain each year in order to reduce wildfire ignition risk in its service territory as quickly as possible. The removal cost for the structures targeted by the Wildfire Mitigation Plan is often higher than normal because those structures are more difficult to access and may require special equipment (such as a helicopter or a temporary bridge) or nonstandard construction methods (such as hand digging, flaggers for trail closures, etc.).

Detailed analysis and results by account are shown in Appendix E-2 and individual account results are discussed below.

FERC Account 350 Transmission Depreciable Land Rights (0 percent)

The currently approved net salvage estimate for this account is zero percent. Retirement activity has been very limited in this account. Since land rights intrinsically have no removal costs (removal costs are attributed to the property on the land) and have no salvage value, a zero percent net salvage was assigned to this account.

FERC Account 352 Transmission Substation Structures and Improvements (Negative 10 percent)

The approved net salvage estimate for this account is negative 5 percent. In the 2020 transaction year, negative 50 and negative 48 percent exist for the five-year and 10-year bands, respectively. Removal cost reflected in this account from 2017-2020 has increased. Due to more negative net salvage indications, this study recommends moving toward those indications with a net salvage estimate of negative 10 percent for this account.

FERC Account 353 Transmission Station Equipment (Negative 20 percent)

The currently approved net salvage estimate for this account is negative 15 percent. In the most recent period, a moving average of negative 40 percent exists for the five-year band and a negative 29 percent exists for the 10-year band. This study recommends a move to a negative 20 percent for this account.

FERC Account 354 Transmission Tower and Fixtures (Negative 20 percent)

The currently approved net salvage estimate for this account is negative 20 percent. A small amount of retirement activity generated a net salvage of negative 400 percent in the 5-year and a negative 174 percent in the 10-year bands. This study recommends retention of the existing negative 20 percent net salvage estimate for this account.

FERC Account 355 Transmission Poles and Fixtures (Negative 60 percent)

The currently approved net salvage estimate for this account is negative 40 percent. In the most recent period, a moving average of negative 180 and negative 179 percent exists for the five-year and 10-year bands, respectively. Throughout much of the history, a negative 60 percent or greater has been experienced in this account. This study recommends moving toward the indications with a negative 60 percent net salvage estimate for this account at this time.

FERC Account 356 Transmission Overhead Conductor (Negative 30 percent)

The currently approved net salvage estimate for this account is negative 25 percent. In the most recent period, a moving average of negative 81 and negative 91 percent exists for the five-year and 10-year bands, respectively. Since 2012, this account has generally experienced net salvage more negative than negative 30 percent. This study recommends moving to a negative 30 percent net salvage estimate for this account.

FERC Account 357 Transmission Underground Conduit (Negative 5 percent)

The current approved net salvage estimate for this account is zero percent. There has been only one year, 2013, with retirements recorded during the study period. While this single year indicates cost of removal will exceed salvage, the moving average shows a negative 40 percent in the 10-year band. The expectation is there will be some removal cost related to assets in this account. This study recommends moving conservatively toward those indications with a negative 5 percent estimate at this time.

FERC Account 358 Transmission Underground Conductor and Devices (Negative 5 percent)

The current approved net salvage estimate for this account is zero percent. There has been cost of removal recorded in every year retirements were recorded. While the moving averages across the years indicate cost of removal will exceed any salvage, the moving averages show negative 34 percent and negative 30 percent in the 5 and 10-year bands, respectively. This study recommends only moving toward these indications by changing from the existing zero percent to a negative 5 percent net salvage for this

account.

FERC Account 359 Transmission Road and Trails (0 percent)

The current approved net salvage estimate for this account is zero percent. There is only one year, 2005, with retirements recorded during the study period. No salvage or cost of removal was recorded, and none is expected. This study recommends retention of the zero percent net salvage for this account.

NET SALVAGE – DISTRIBUTION PROPERTY

Increasing levels of removal cost are experienced in most accounts in this function. Many of the same factors listed above for Transmission are also contributing factors for more negative net salvage in the Distribution function. The salvage received for retired assets has decreased over that time while the removal cost of assets has increased dramatically. Detailed analysis and results by account are shown in Appendix E-2 and individual account results are discussed below.

FERC Account 360 Distribution Depreciable Land Rights (0 percent)

The currently approved net salvage estimate for this account is zero percent. Retirement activity has been very limited in this account. Since land rights intrinsically have no removal costs (removal costs are attributed to the property on the land) and have no salvage value, a zero percent net salvage estimate is retained for this account.

FERC Account 361 Distribution Substation Structures and Improvements (Negative 10 percent)

The current approved net salvage estimate for this account is negative 5 percent. Transactional history shows a negative net salvage in nearly every year analyzed. In the most recent period, a moving average of negative 74 and negative 70 percent exists for the five-year and 10-year bands, respectively. Based on the transactional history, a proposed net salvage estimate of negative 10 percent is supported and recommended for this account.

FERC Account 362 Distribution Substation Equipment (Negative 20 percent)

The current approved net salvage estimate for this account is negative 10 percent. In the most recent period, a moving average of negative 33 and negative 37 percent exists for the five-year and 10-year bands. After examining PSCo history, moving toward the more negative indications with a negative 20 percent net salvage estimate is recommended for this account.

FERC Account 363 Energy Storage Equipment (proposed 0 percent net salvage)

This account includes any gross salvage or cost of removal associated with energy storage equipment. This is a new account that has not been used in the past. Based on information from the Company, 0 percent net salvage is recommended for this account.

FERC Account 364 Distribution Poles, Towers, and Fixtures (Negative 60 percent)

The current approved net salvage estimate for this account is negative 50 percent. In the most recent period, a moving average of negative 731 percent and negative 511 percent exists for the five-year and 10-year bands, respectively. This level of negative net salvage would be such a significant change and cause a drastic increase in PSCo's depreciation expense for this account. However, with the consistent level indicated and to conservatively move toward the more negative indications, the study recommends an incremental movement to a negative 60 percent net salvage estimate.

FERC Account 365 Distribution Overhead Conductor and Devices (Negative 50 percent)

The current approved net salvage estimate for this account is negative 40 percent. In the most recent period, a moving average of negative 196 and negative 160 percent exists for the five-year and 10-year bands, respectively. These higher negative net salvage levels are being consistently recorded in the analysis beginning around 2011. This study recommends moving toward those indications with a negative 50 percent net salvage estimate.

FERC Account 366 Distribution Underground Conduit (Negative 30 percent)

The current approved net salvage estimate for this account is negative 25 percent. This account has demonstrated erratic levels of net salvage. In the most recent period, a moving average of negative 508 and negative 298 percent exists for the five-year and 10-year bands, respectively. To incrementally model net salvage in the future and give recognition to the higher negative net salvage indications, a negative 30 percent net salvage estimate is proposed for this account at this time.

FERC Account 367 Distribution Underground Conductor and Devices (Negative 10 percent)

The currently approved net salvage estimate for this account is negative 5 percent. In the most recent period, a moving average of negative 69 percent and negative 37 percent exists for the five-year and 10-year bands, respectively. To model net salvage toward the indications, a negative 10 percent estimate is recommended for this account.

FERC Account 368 Distribution Line Transformers (Negative 10 percent)

The currently approved net salvage estimate for this account is negative 10 percent. In the most recent period, a moving average of negative 0.39 and negative 15 percent exists for the five-year and 10-year bands, respectively. Some large salvage and high cost of removal was recorded in 2018 and 2019. Looking at the most recent 10-year indication, this study recommends retention of the existing negative 10 percent net salvage estimate for this account at this time.

FERC Account 369 Distribution Services (Negative 40 percent)

The currently approved net salvage estimate for this account is negative 30 percent. In the most recent period, a moving average of negative 136 percent and negative 147 percent exists for the five-year and 10-year bands, respectively. This study recommends conservatively moving toward the indications with a negative 40 percent net salvage estimate for this account.

FERC Account 370 Distribution Meters (0 percent)

The currently approved net salvage estimate for this account is zero percent. In the most recent period, a moving average of negative 18 and negative 20 percent exists for the five-year and 10-year bands, respectively. Most years recorded no removal cost. This study recommends retention of the existing negative zero percent net salvage estimate for this account.

FERC Account 370.02 AGIS-AMI Equipment (0 percent)

This account will include net salvage for AGIS AMI equipment. This is a new account with no history. Previously similar assets were booked in Account 370.2. The Company is currently using zero percent net salvage as the approved parameter for Account 370.2. Based on judgment, zero percent net salvage is recommended for this account.

FERC Account 370.20 Automated Meter Reading Equipment (0 percent)

This account includes net salvage for automated meter reading equipment. As shown in Appendix E-2, both the 5 and 10 year moving average show 0 percent net salvage. The Company is currently using zero percent net salvage as the approved parameter for this account. Based on judgment and history, zero percent net salvage is recommended for this account.

FERC Account 371 Distribution Installation on Customers' Premises (Negative 20 percent)

The currently approved net salvage estimate for this account is negative 20 percent. In the most recent period, a moving average of negative 33 percent and negative 34 percent exists for the five-year and 10-year bands, respectively. There have been no retirements recorded in the last three years. Conservatively, we recommend retention of the existing negative 20 percent net salvage estimate for this account at this time.

FERC Account 371.40 Installations on Customer's Premises-EV (0 percent)

This account includes the service panel, the charge stub, and the wiring between the two for electric vehicles charging on customer's premises. This is a new account and there is currently no plant at December 31, 2020. Based on information from the Company, this study proposes zero percent net salvage for this account.

FERC Account 373 Distribution Street Lighting (Negative 25 percent)

The currently approved net salvage estimate for this account is negative 25 percent.

In the most recent period, a moving average of negative 30 percent and negative 32 percent exists for the five-year and 10-year bands, respectively. This study recommends retention of the existing to a negative 25 percent net salvage estimate for this account at this time.

NET SALVAGE ELECTRIC INTANGIBLE PLANT

Electric Intangible Plant Accounts, FERC Accounts 303.00–303.14

For accounts in this function that are recommended for intangible plant amortization, generally no salvage or cost of removal is incurred at retirement.

FERC Account 303.03 Miscellaneous Computer Software – 3 year (0%)

This account consists of any salvage and removal cost associated with miscellaneous computer software having a 3-year life. The current authorized net salvage for this account is zero percent; this Study recommends retaining zero percent net salvage for this account. The Company's next depreciation study will examine future trends in this account.

FERC Account 303.07 Miscellaneous Computer Software – 7 year (0%)

This account consists of any salvage and removal cost associated with miscellaneous computer software with a 7-year life. The current authorized net salvage for this account is zero percent; this Study recommends retaining zero percent net salvage for this account. The Company's next depreciation study will examine future trends in this account.

FERC Account 303.10 Miscellaneous Computer Software – 10 year (0%)

This account consists of any salvage and removal cost associated with miscellaneous computer software with a 10-year life. The current authorized net salvage for this account is zero percent; this Study recommends retaining zero percent net salvage for this account.

FERC Account 303.15 Miscellaneous Computer Software – 15 year (0%)

This account consists of any salvage and removal cost associated with miscellaneous computer software with a 15-year life. The current authorized net salvage for this account is zero percent; the recommendation in this Study is to retain the zero percent net salvage for this account.

NET SALVAGE – GENERAL PROPERTY

For accounts depreciated in the general function (Accounts 389 and 390), see below for the detailed account discussion. For General Property plant Accounts 391-398, PSCo will continue the use of AR-15 (Amortized) using the study recommended net salvage parameters. Detailed analysis and results by account are shown in Appendix E-2 and individual account results are discussed below.

FERC Account 389 Land Rights (0 percent)

The currently approved net salvage estimate for this account is zero percent. Land rights generally have no salvage value at retirement, and none is shown in the analysis. A zero percent net salvage estimate is recommended to be retained for this account.

FERC Account 390 Structures and Improvements (Negative 10 percent)

The currently approved net salvage estimate for this account is a negative five percent. This account consists of all General Property structures, which may range from buildings to building components such as HVAC systems or roofs. The most recent five- and 10-year moving averages show negative 186 and negative 64 percent net salvage, respectively. Based on the fact that salvage has declined and is not expected to change in the future while cost of removal has increased, this study recommends moving toward the negative net salvage indications, but limiting it to a negative 10 percent net salvage estimate for this account at this time.

FERC Account 391 Office Furniture and Equipment (0 percent)

This account consists of gross salvage and cost of removal for miscellaneous office furniture such as desks, chairs, filing cabinets, and tables used for general utility service. The currently approved net salvage estimate for this account is zero percent. There is only one year where salvage has been recorded. There has been some cost of removal, but it is very limited. The most recent five- and 10-year moving averages are both less than a negative one percent. To model net salvage in the future, a zero percent net salvage estimate is recommended for this account.

FERC Account 391.2 Computer Equipment (0 percent)

This account consists of gross salvage and cost of removal for network computer equipment used for general utility service. The currently approved net salvage estimate for this account is zero percent. Activity is only recorded since 2015 with some indication that some cost of removal is possible. However, overall indications are negligible. Therefore, retaining a zero percent net salvage estimate is recommended for this account.

FERC Account 392.10 Transportation Equipment - Autos (10 percent)

The currently approved net salvage estimate for this account is 10 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCo discontinued the like kind exchange program and sold used transportation equipment. Only since 2015 has the history been segregated into some subaccounts that the assets will be booked in going forward. Data from the fleet department, which includes both owned and leased assets, was used to estimate net salvage for this account. Data included electric and common plant. This approach was used in the prior depreciation study as well. The information from the fleet department shows an overall average of 10.38% in the period from 2014-2020 as shown in Appendix E-4. Based on Company data and history, this study recommends retaining positive 10 percent net salvage estimate for this account.

FERC Account 392.20 Transportation Equipment - Light Trucks (10 percent)

The currently approved net salvage estimate for this account is 10 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCo discontinued the like kind exchange program and sold used transportation equipment. Only since 2015 has the history been segregated into some subaccounts that the assets will be booked in going forward. Data from the fleet department, which includes both owned and leased assets, was used to estimate net salvage for this account. Data included electric and common plant. This approach was used in the prior depreciation study as well. The information from the fleet department shows an overall average of 11.50% in the period from 2014-2020, as shown

in Appendix E-4. Based on Company data and history, this study recommends retaining positive 10 percent net salvage estimate for this account.

FERC Account 392.30 Transportation Equipment - Trailers (20 percent)

The currently approved net salvage estimate for this account is 20 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCo discontinued the like kind exchange program and sold used transportation equipment. discontinued the like kind exchange program and sold used transportation equipment. Only since 2015 has the history been segregated into some subaccounts that the assets will be booked in going forward. Data from the fleet department, which includes both owned and leased assets, was used to estimate net salvage for this account. Data included electric and common plant. This approach was used in the prior depreciation study as well. The information from the fleet department shows an overall average of 21.22% in the period from 2014-2020, as shown in Appendix E-4. Based on Company data and history, this study recommends retaining positive 20 percent net salvage estimate for this account.

FERC Account 392.40 Transportation Equipment – Heavy Trucks (10 percent)

The currently approved net salvage estimate for this account is 10 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCo discontinued the like kind exchange program and sold used transportation equipment. Only since 2015 has the history been segregated into some subaccounts that the assets will be booked in going forward. Data from the fleet department, which includes both owned and leased assets, was used to estimate net salvage for this account. Data included electric and common plant. This approach was used in the prior depreciation study as well. The information from the fleet department shows an overall average of 10.13% in the period from 2014-2020, as shown in Appendix E-4. Based on Company data and history, this study recommends retaining positive 10 percent net salvage estimate for this account.

FERC Account 393 Stores Equipment (0 percent)

This account consists of gross salvage and cost of removal for stores equipment used for general utility service. The currently approved net salvage estimate for this account is zero percent. This kind of equipment seldom produces any gross salvage or cost of removal and none has been recorded. To model net salvage in the future, a zero percent net salvage estimate is retained for this account.

FERC Account 394 Tools, Shop, and Garage Equipment (0 percent)

This account consists of gross salvage and cost of removal for various items or tools used in shop and garages such as air compressors, grinders, mixers, hoists, and cranes. The currently approved net salvage estimate for this account is zero percent. No salvage but some cost of removal has been recorded. To model net salvage in the future, a zero percent net salvage estimate is retained.

FERC Account 395 Laboratory Equipment (0 percent)

This account consists of gross salvage and cost of removal for laboratory equipment used in general utility service. The currently approved net salvage estimate for this account is zero percent. The most recent five-year and 10-year net salvage percentages are zero percent for both bands. To model net salvage in the future, a zero percent net salvage estimate is retained for this account.

FERC Account 396 Power Operated Equipment (30 percent)

The currently approved net salvage estimate for this account is 15 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCO discontinued the like kind exchange program and sold used power operated equipment. Only since 2015 has the history been segregated into some accounts. Data from the fleet department which includes both owned and leased assets to estimate net salvage for this account. Data included electric and common plant. This approach was used in the prior depreciation study as well. The information from the fleet department shows an overall average of 35.83% in the period from 2014-2020, as shown in Appendix E-4. This is much higher than is typically seen in

the utility industry. To move in the direction of this trend, this study recommends moving to positive 30 percent net salvage estimate for this account.

FERC Account 397 Communication Equipment (0 percent)

This account consists of gross salvage and cost of removal for miscellaneous communication equipment used in general utility service. The currently approved net salvage estimate for this account is zero percent. The most recent five and 10-year net salvage percentage is negative 12 and negative four percent. To model net salvage in the future, a zero net salvage estimate is recommended for this account.

FERC Account 398 Miscellaneous Equipment (0 percent)

This account consists of gross salvage and cost of removal for miscellaneous equipment used in general utility service. The currently approved net salvage estimate for this account is zero percent. The most recent five and 10-year net salvage percentage is zero percent. No salvage or cost of removal has been recorded in the years being analyzed. To model net salvage in the future, a zero percent net salvage estimate is retained for this account.

NET SALVAGE COMMON INTANGIBLE PLANT

Common Intangible Plant Accounts, FERC Accounts 303.00–303.14

For accounts in this function that are recommended for intangible plant amortization, generally no salvage or cost of removal is incurred at retirement.

FERC Account 303.03 Miscellaneous Computer Software – 3 year (0%)

This account consists of any salvage and removal cost associated with miscellaneous computer software having a 3-year life. The current authorized net salvage for this account is zero percent; this Study recommends retaining zero percent net salvage for this account.

FERC Account 303.07 Miscellaneous Computer Software – 7 year (0%)

This account consists of any salvage and removal cost associated with miscellaneous computer software with a 7-year life. The current authorized net salvage for this account is zero percent; this Study recommends retaining zero percent net salvage for this account.

FERC Account 303.10 Miscellaneous Computer Software – 10 year (0%)

This account consists of any salvage and removal cost associated with miscellaneous computer software with a 10-year life. The current authorized net salvage for this account is zero percent; this Study recommends retaining zero percent net salvage for this account.

FERC Account 303.15 Miscellaneous Computer Software – 15 year (0%)

This account consists of any salvage and removal cost associated with miscellaneous computer software with a 15-year life. The current authorized net salvage for this account is zero percent; the recommendation in this Study is to retain the zero percent net salvage for this account.

NET SALVAGE COMMON GENERAL PLANT ACCOUNTS

FERC Account 389.00 Land Rights (0%)

This account consists of gross salvage and cost of removal for land rights associated with office buildings, garages, warehouses, service centers, and other buildings used for general utility service. Based on experience with other land rights accounts, this Study recommends zero percent net salvage for this account. The Company's next depreciation study will examine future trends in this account.

FERC Account 390.00 General Structures & Improvements (-10%)

This account consists of any salvage and removal cost associated with office buildings, garages, warehouses, service centers, and other buildings used for common general utility service. The current approved net salvage is negative 10 percent. Excluding sales, any salvage is being exceeded by cost of removal. In the most recent bands, the five- and 10-year averages are negative 10.34 and negative 14.25 percent net salvage, respectively. Based upon the analysis, excluding sales, this Study recommends remaining at a negative 10 percent net salvage for this account. The Company's next depreciation study will examine future trends in this account.

FERC Account 391.00 General Office Furniture & Equipment (0%)

This account consists of consists of any salvage and removal cost associated with office furniture and equipment used for general utility service. The current approved net salvage is zero percent. Some salvage is recorded with offsetting cost of removal. The Company expects no salvage at end of life, and this is confirmed in the analysis. This Study recommends retention of zero percent net salvage for this account.

FERC Account 391.04 Computer Hardware (0%)

This account includes any salvage and removal cost related to computer hardware. The current approved net salvage is 0 percent. Computer equipment typically has no salvage or removal cost. Based on expectations for no salvage at end of life, this Study recommends retaining a zero percent net salvage for this account.

FERC Account 392.10 Transportation Equipment – Automobiles (10%)

The currently approved net salvage estimate for this account is 10 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCO discontinued the like kind exchange program and sold used transportation equipment. The data discussed in the general function for this account was also used to estimate net salvage for this account. Please see the discussion in general plant and Appendix E-4 for more information. Based on the recommendation for General Plant Account 392.10, this study recommends retention of positive 10 percent net salvage estimate for this account.

FERC Account 392.20 Transportation Equipment - Light Trucks (10 percent)

The currently approved net salvage estimate for this account is 10 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCO discontinued the like kind exchange program and sold used transportation equipment. The data discussed in the general function for this account was also used to estimate net salvage for this account. Please see the discussion in general plant and Appendix E-4 for more information. Based on the recommendation for General Plant Account 392.20, this study recommends retention of positive 10 percent net salvage estimate for this account.

FERC Account 392.30 Transportation Equipment - Trailers (20 percent)

The currently approved net salvage estimate for this account is 20 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCO discontinued the like kind exchange program and sold used transportation equipment. The data discussed in the general function for this account was also used to estimate net salvage for this account. Please see the discussion in general plant and Appendix E-4 for more information. Based on the recommendation for General Plant Account 392.30, this study recommends retention of positive 20 percent net salvage estimate for this account.

FERC Account 392.40 Transportation Equipment – Heavy Trucks (10 percent)

The currently approved net salvage estimate for this account is 10 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCo discontinued the like kind exchange program and sold used transportation equipment. The data discussed in the general function for this account was also used to estimate net salvage for this account. Please see the discussion in general plant and Appendix E-4 for more information. Based on the recommendation for General Plant Account 392.40, this study recommends retention of positive 10 percent net salvage estimate for this account.

FERC Account 393.00 Stores Equipment (0%)

This account includes any salvage and removal cost related to general stores equipment. The current approved net salvage is zero percent. No salvage or cost of removal has been recorded and none is expected. This Study recommends retaining the zero percent net salvage for this account.

FERC Account 394.00 Tools & Shop Equipment (0%)

This account consists of any salvage and removal cost associated with various items or tools used in shop and garages, such as air compressors, grinders, mixers, hoists, and cranes. The current authorized net salvage for this account is zero percent. Some salvage has been recorded in transactions years 2004-2008, and removal cost has been recorded in transaction years 2011-2012 due to clean-up efforts by the Company. Future expectations are that no salvage or cost of removal will occur at end of life for these types of assets. This Study recommends retaining the zero percent net salvage for this account.

FERC Account 395.00 Laboratory Equipment (0%)

This account includes any salvage and removal cost related to general laboratory equipment. The current approved net salvage is zero percent. Based on the history and expectations, this Study recommends a zero percent for this account.

FERC Account 396.00 Power Operated Equipment (30%)

The currently approved net salvage estimate for this account is 15 percent. Previously, PSCo recorded proceeds against the cost of a new asset as a part of a like kind exchange program. In 2014, PSCo discontinued the like kind exchange program and sold used power operated equipment. The data discussed in the general function for this account was also used to estimate net salvage for this account. Please see the discussion in general plant and Appendix E-4 for more information. Based on the recommendation for General Plant Account 396.00, this study recommends moving to a positive 30 percent net salvage estimate for this account.

FERC Account 397.00 Communication Equipment (0%)

This account includes any salvage and removal cost related to general communication equipment. The current approved net salvage is zero percent. No salvage is expected and negligible, if any, cost of removal is anticipated. This Study recommends retention of zero percent net salvage for this account. The Company's next depreciation study will examine future trends in this account.

FERC Account 398.00 Miscellaneous Equipment (0%)

This account includes any salvage and removal cost related to general miscellaneous equipment. The current approved net salvage is zero percent. No salvage is expected and negligible, if any, cost of removal is anticipated. This Study recommends retention of zero percent net salvage for this account. The Company's next depreciation study will examine future trends in this account.

APPENDIX A
Computation of Depreciation Accrual Rates

PUBLIC SERVICE OF COLORADO
COMPUTATION OF DEPRECIATION ACCRUAL RATE
AT DECEMBER 31, 2020

Plant or Unit	Account No.	Description	Surviving Balance 12/31/2020 (1)	Accumulated Depreciation 12/31/2020 (2)	Net Salvage % (3)	Net Salvage Amount (4)= (1) x (3)	Unaccrued Balance (5)= (1)- (2)-(4)	Remaining Life (6)	Annual Accrual (7) =(5)/(6)	Accrual Rate (8)= (7)/(1)	Notes
STEAM PRODUCTION											
Cameo	310.2 Land Rights		1,392	1,392	0	0	0	0.00	0	0.00%	
			1,392	1,392		0	0		0	0.00%	
Cherokee Unit 2 SC	314 Turbogenerator Units		1,822,036	1,193,457	-0.57%	(10,461)	639,040	6.28	101,812	5.59%	
Cherokee Unit 2 SC	315 Accessory Electric Equipment		2,060,951	1,423,670	-0.33%	(6,887)	644,168	6.34	101,652	4.93%	
	Cherokee Unit 2 SC - Total/Composite		3,882,987	2,617,127		(17,348)	1,283,208		203,464	5.24%	
Cherokee Unit 4	311 Structures and Improvements		11,176,565	9,087,467	-12.90%	(1,441,547)	3,530,646	6.43	549,354	4.92%	
Cherokee Unit 4	312 Boiler Plant Equipment		41,421,999	32,716,691	-13.25%	(5,489,249)	14,194,557	6.27	2,265,051	5.47%	
Cherokee Unit 4	312 Boiler Plant AQIR		2,094,832	1,539,040	-12.52%	(262,287)	818,079	6.33	129,229	6.17%	
Cherokee Unit 4	314 Turbogenerator Units		26,921,788	21,069,556	-13.22%	(3,559,523)	9,411,756	6.28	1,498,225	5.57%	
Cherokee Unit 4	315 Accessory Electric Equipment		8,681,064	7,262,345	-12.89%	(1,119,191)	2,537,910	6.35	399,789	4.61%	
Cherokee Unit 4	315.2 Computers and Peripherals		3,233,582	2,988,770	0.00%	0	244,812	0.68	244,812	11.11%	(3)
Cherokee Unit 4	316 Miscellaneous Equipment		548,747	332,434	-12.79%	(70,198)	286,511	6.25	45,817	8.35%	
	Cherokee Unit 4 - Total/Composite		94,076,576	74,996,302		(11,941,995)	31,024,270		5,132,277	5.46%	
Cherokee Common	310.2 Land Rights		12,865,962	9,103,317	0.00%	0	3,762,645	6.50	578,868	4.50%	
Cherokee Common	310.3 Water Rights		112,245	70,631	0.00%	0	41,613	6.50	6,402	5.70%	
Cherokee Common	311 Structures and Improvements		43,733,073	29,475,194	-16.18%	(7,075,141)	21,333,021	6.46	3,301,242	7.55%	
Cherokee Common	312 Boiler Plant Equipment		10,756,698	6,878,802	-16.64%	(1,790,449)	5,668,345	6.31	897,976	8.35%	
Cherokee Common	312 Boiler Plant AQIR		2,461,276	1,864,014	-15.99%	(393,558)	990,819	6.33	156,516	6.36%	
Cherokee Common	314 Turbogenerator Units		229,286	185,470	-16.48%	(37,789)	81,605	6.38	12,794	5.58%	
Cherokee Common	315 Accessory Electric Equipment		9,369,122	7,764,227	-16.30%	(1,526,874)	3,131,770	6.37	491,923	5.25%	
Cherokee Common	315.2 Computers and Peripherals		0	0	0.00%	0	0	0.00	0	11.11%	(2)
Cherokee Common	316 Miscellaneous Equipment		1,654,248	1,251,407	-16.27%	(269,133)	671,974	6.26	107,399	6.49%	
	Cherokee Common - Total/Composite		81,181,909	56,593,062		(11,092,945)	35,681,792		5,553,120	6.84%	
Coal Cars	312 Boiler Plant Equipment		20,020,245	9,551,389	0.00%	0	10,468,856	11.47	912,866	4.56%	
	Coal Cars - Total/Composite		20,020,245	9,551,389		0	10,468,856		912,866	4.56%	
Comanche Unit 1	311 Structures and Improvements		16,633,155	10,849,144	-4.38%	(727,946)	6,511,957	12.06	539,905	3.25%	
Comanche Unit 1	312 Boiler Plant Equipment		216,416,165	119,448,342	-4.38%	(9,480,164)	106,447,987	11.81	9,013,017	4.16%	
Comanche Unit 1	314 Turbogenerator Units		40,220,828	20,387,658	-4.16%	(1,674,590)	21,507,760	13.67	1,573,243	3.91%	
Comanche Unit 1	315 Accessory Electric Equipment		20,471,436	12,314,198	-3.84%	(786,338)	8,943,576	11.93	749,869	3.66%	
Comanche Unit 1	315.2 Computers and Peripherals		1,407,501	567,331	0.00%	0	840,170	0.00	156,389	11.11%	(3)
Comanche Unit 1	316 Miscellaneous Equipment		914,298	374,259	-3.65%	(33,410)	573,449	11.26	50,912	5.57%	
	Comanche Unit 1 - Total/Composite		296,063,384	163,940,932		(12,702,448)	144,824,899		12,083,336	4.08%	
Comanche Unit 2	311 Structures and Improvements		8,413,195	5,294,861	-5.73%	(482,410)	3,600,744	13.73	262,225	3.12%	
Comanche Unit 2	312 Boiler Plant Equipment		177,575,948	92,705,581	-5.22%	(9,267,547)	94,137,914	13.55	6,945,945	3.91%	
Comanche Unit 2	314 Turbogenerator Units		40,368,504	19,728,169	-5.21%	(2,101,801)	22,742,135	13.55	1,678,532	4.16%	
Comanche Unit 2	315 Accessory Electric Equipment		22,984,266	11,518,199	-4.42%	(1,015,921)	12,481,988	13.88	899,381	3.91%	
Comanche Unit 2	315.2 Computers and Peripherals		0	0	0.00%	0	0	0.00	0	11.11%	(2)
Comanche Unit 2	316 Miscellaneous Equipment		871,236	463,933	-4.42%	(38,519)	445,822	12.55	35,532	4.08%	
	Comanche Unit 2 - Total/Composite		250,213,149	129,710,744		(12,906,199)	133,408,604		9,821,614	3.93%	
Comanche Cm Retire with Unit 1 & 2	311 Structures and Improvements		1,505,849	1,003,604	-42.80%	(644,501)	1,146,747	14.21	80,712	5.36%	
Comanche Cm Retire with Unit 1 & 2	312 Boiler Plant Equipment		14,842,287	6,679,996	-43.69%	(6,485,247)	14,647,537	13.36	1,096,330	7.39%	
Comanche Cm Retire with Unit 1 & 2	314 Turbogenerator Units		2,133,205	986,382	-43.67%	(931,494)	2,078,317	13.63	152,463	7.15%	
Comanche Cm Retire with Unit 1 & 2	315 Accessory Electric Equipment		1,643,329	194,984	-42.27%	(694,641)	2,142,985	14.26	150,330	9.15%	
Comanche Cm Retire with Unit 1 & 2	315.2 Computers and Peripherals		190,989	52,230	0.00%	0	138,759	0.00	21,221	11.11%	(3)
Comanche Cm Retire with Unit 1 & 2	316 Miscellaneous Equipment		661,437	(216,098)	-42.53%	(281,307)	1,158,842	14.52	79,788	12.06%	
	Comanche Cm Retire with Unit 1 & 2 - Total/Composite		20,977,095	8,701,098		(9,037,190)	21,313,187		1,580,843	7.54%	
Comanche Unit 3	310.2 Land Rights		8,159	1,561	0.00%	0	6,598	49.50	133	1.63%	
Comanche Unit 3	311 Structures and Improvements		129,287,485	20,583,253	-4.51%	(5,831,193)	114,535,425	45.07	2,541,337	1.97%	
Comanche Unit 3	312 Boiler Plant Equipment		544,630,626	76,580,346	-6.98%	(38,001,519)	506,051,799	38.09	13,285,545	2.44%	
Comanche Unit 3	314 Turbogenerator Units		166,669,836	30,170,281	-7.25%	(12,087,884)	148,587,439	41.75	3,558,800	2.14%	
Comanche Unit 3	315 Accessory Electric Equipment		90,629,149	14,509,807	-3.73%	(3,379,562)	79,498,904	45.24	1,757,312	1.94%	
Comanche Unit 3	315.2 Computers and Peripherals		0	0	0.00%	0	0	0.00	0	11.11%	(2)
Comanche Unit 3	316 Miscellaneous Equipment		19,398,331	3,512,761	-3.60%	(698,191)	16,583,761	36.82	450,385	2.32%	
	Comanche Unit 3 - Total/Composite		950,623,587	145,358,010		(59,998,349)	865,263,926		21,593,512	2.27%	

PUBLIC SERVICE OF COLORADO
COMPUTATION OF DEPRECIATION ACCRUAL RATE
AT DECEMBER 31, 2020

Plant or Unit	Account No.	Description	Surviving Balance 12/31/2020 (1)	Accumulated Depreciation 12/31/2020 (2)	Net Salvage % (3)	Net Salvage Amount (4)= (1) x (3)	Unaccrued Balance (5)= (1)- (2)-(4)	Remaining Life (6)	Annual Accrual (7) = (5)/(6)	Accrual Rate (8)= (7)/(1)	Notes
Comanche Cm Retire with Unit 3	311 Structures and Improvements		31,692,101	14,671,592	-74.76%	(23,694,266)	40,714,775	38.53	1,056,576	3.33%	
Comanche Cm Retire with Unit 3	312 Boiler Plant Equipment		18,715,540	4,203,214	-69.73%	(13,049,808)	27,562,134	38.22	721,114	3.85%	
Comanche Cm Retire with Unit 3	314 Turbogenerator Units		178,872	59,098	-70.21%	(125,581)	245,355	39.06	6,282	3.51%	
Comanche Cm Retire with Unit 3	315 Accessory Electric Equipment		2,434,794	873,849	-68.64%	(1,671,232)	3,232,177	39.39	82,048	3.37%	
Comanche Cm Retire with Unit 3	315.2 Computers and Peripherals		0	0	0.00%	0	0	0.00	0	11.11%	(2)
Comanche Cm Retire with Unit 3	316 Miscellaneous Equipment		1,892,038	691,868	-66.38%	(1,255,916)	2,456,086	28.45	86,342	4.56%	
Comanche Cm Retire with Unit 3 - Total/Composite			54,913,345	20,499,620		(39,796,803)	74,210,628		1,952,362	3.56%	
Craig Unit 1	311 Structures and Improvements		6,681,129	5,488,154	-2.83%	(189,019)	1,381,994	4.46	309,747	4.64%	
Craig Unit 1	312 Boiler Plant Equipment		18,516,678	15,378,991	-3.05%	(564,118)	3,701,806	4.38	844,292	4.56%	
Craig Unit 1	314 Turbogenerator Units		2,342,209	1,367,822	-2.65%	(62,156)	1,036,543	4.48	231,337	9.88%	
Craig Unit 1	315 Accessory Electric Equipment		2,901,979	2,320,811	-2.78%	(80,615)	661,783	4.43	149,234	5.14%	
Craig Unit 1	315.2 Computers and Peripherals		0	0	0.00%	0	0	0.00	0	11.11%	(2)
Craig Unit 1	316 Miscellaneous Equipment		122,465	105,353	-2.77%	(3,396)	20,508	4.32	4,749	3.88%	
Craig Unit 1 - Total/Composite			30,564,460	24,661,130		(899,304)	6,802,634		1,539,359	5.04%	
Craig Unit 2	311 Structures and Improvements		6,571,154	4,097,670	-4.09%	(268,643)	2,742,127	17.41	157,504	2.40%	
Craig Unit 2	312 Boiler Plant Equipment		33,300,984	10,982,421	-3.61%	(1,202,544)	23,521,106	16.94	1,388,310	4.17%	
Craig Unit 2	314 Turbogenerator Units		7,102,887	3,127,137	-3.50%	(248,620)	4,224,370	17.06	247,553	3.49%	
Craig Unit 2	315 Accessory Electric Equipment		3,564,960	2,160,019	-3.14%	(111,926)	1,516,867	16.98	89,351	2.51%	
Craig Unit 2	315.2 Computers and Peripherals		0	0	0.00%	0	0	0.00	0	11.11%	(2)
Craig Unit 2	316 Miscellaneous Equipment		139,310	74,343	-2.58%	(3,596)	68,562	15.46	4,436	3.18%	
Craig Unit 2 - Total/Composite			50,679,294	20,441,591		(1,835,328)	32,073,032		1,887,154	3.72%	
Craig Common	311 Structures and Improvements		7,300,852	4,537,949	-15.83%	(1,155,691)	3,918,594	17.67	221,756	3.04%	
Craig Common	312 Boiler Plant Equipment		23,740,228	12,182,706	-15.99%	(3,797,116)	15,354,639	16.90	908,330	3.83%	
Craig Common	314 Turbogenerator Units		3,300,265	1,800,250	-16.00%	(528,140)	2,028,156	16.97	119,536	3.62%	
Craig Common	315 Accessory Electric Equipment		2,111,220	1,289,963	-15.20%	(320,876)	1,142,133	17.26	66,189	3.14%	
Craig Common	315.2 Computers and Peripherals		319,851	297,845	0.00%	0	22,006	0.62	22,006	11.11%	(3)
Craig Common	316 Miscellaneous Equipment		2,006,357	824,580	-14.76%	(296,121)	1,477,897	16.40	90,114	4.49%	
Craig Common - Total/Composite			38,778,773	20,933,293		(6,097,944)	23,943,424		1,427,930	3.68%	
Hayden Unit 1	311 Structures and Improvements		6,751,016	5,644,514	-8.11%	(547,562)	1,654,063	8.82	187,441	2.78%	
Hayden Unit 1	312 Boiler Plant Equipment		122,772,414	61,972,105	-6.72%	(8,247,706)	69,048,015	9.12	7,575,088	6.17%	
Hayden Unit 1	314 Turbogenerator Units		17,831,841	11,549,281	-6.76%	(1,205,239)	7,487,799	9.00	831,640	4.66%	
Hayden Unit 1	315 Accessory Electric Equipment		5,142,587	3,890,844	-6.68%	(343,326)	1,595,069	8.91	179,018	3.48%	
Hayden Unit 1	315.2 Computers and Peripherals		1,135,642	982,833	0.00%	0	152,808	1.21	126,182	11.11%	(3)
Hayden Unit 1	316 Miscellaneous Equipment		257,721	163,839	-6.26%	(16,141)	110,023	8.41	13,086	5.08%	
Hayden Unit 1 - Total/Composite			153,891,220	84,203,417		(10,359,974)	80,047,777		8,912,456	5.79%	
Hayden Unit 2	311 Structures and Improvements		27,926,499	13,468,445	-3.55%	(991,623)	15,449,677	15.13	1,021,369	3.66%	
Hayden Unit 2	312 Boiler Plant Equipment		99,358,411	43,829,941	-4.31%	(4,286,037)	59,814,508	14.36	4,164,541	4.19%	
Hayden Unit 2	314 Turbogenerator Units		15,131,935	8,404,043	-4.54%	(687,557)	7,415,448	14.18	523,068	3.46%	
Hayden Unit 2	315 Accessory Electric Equipment		6,993,246	4,347,259	-3.85%	(269,428)	2,915,414	14.42	202,226	2.89%	
Hayden Unit 2	315.2 Computers and Peripherals		975,875	658,110	0.00%	0	317,765	2.93	108,431	11.11%	(3)
Hayden Unit 2	316 Miscellaneous Equipment		1,165,183	360,289	-3.30%	(38,455)	843,349	13.86	60,855	5.22%	
Hayden Unit 2 - Total/Composite			151,551,148	71,068,088		(6,273,101)	86,756,161		6,080,489	4.01%	
Hayden Common	311 Structures and Improvements		7,904,667	3,494,931	-35.11%	(2,775,372)	7,185,108	15.42	466,104	5.90%	
Hayden Common	312 Boiler Plant Equipment		29,313,231	19,446,970	-36.58%	(10,721,753)	20,588,015	14.46	1,424,224	4.86%	
Hayden Common	314 Turbogenerator Units		1,590,973	915,886	-35.94%	(571,859)	1,246,945	14.96	83,334	5.24%	
Hayden Common	315 Accessory Electric Equipment		299,321	164,399	-35.20%	(105,368)	240,291	15.26	15,748	5.26%	
Hayden Common	315.2 Computers and Peripherals		0	0	0.00%	0	0	0.00	0	11.11%	(2)
Hayden Common	316 Miscellaneous Equipment		1,970,611	837,041	-35.53%	(700,154)	1,833,724	14.37	127,608	6.48%	
Hayden Common - Total/Composite			41,078,804	24,859,226		(14,874,506)	31,094,084		2,117,017	5.15%	
Pawnee Unit 1	311 Structures and Improvements		141,874,484	87,759,324	-4.32%	(6,134,068)	60,249,228	19.24	3,130,746	2.21%	
Pawnee Unit 1	312 Boiler Plant Equipment		567,806,245	190,283,175	-3.84%	(21,795,012)	399,318,082	18.67	21,391,647	3.77%	
Pawnee Unit 1	314 Turbogenerator Units		75,873,783	34,045,784	-4.02%	(3,047,476)	44,875,476	18.58	2,415,509	3.18%	
Pawnee Unit 1	315 Accessory Electric Equipment		61,689,230	35,878,769	-3.32%	(2,046,512)	27,856,974	18.71	1,488,826	2.41%	
Pawnee Unit 1	315.2 Computers and Peripherals		8,163,408	6,699,052	0.00%	0	1,464,356	1.61	907,045	11.11%	(3)
Pawnee Unit 1	316 Miscellaneous Equipment		6,182,794	3,280,327	-2.72%	(168,110)	3,070,578	16.90	181,682	2.94%	
Pawnee Unit 1 - Total/Composite			861,589,944	357,946,430		(33,191,179)	536,834,693		29,515,456	3.43%	

PUBLIC SERVICE OF COLORADO
COMPUTATION OF DEPRECIATION ACCRUAL RATE
AT DECEMBER 31, 2020

Plant or Unit	Account No.	Description	Surviving Balance 12/31/2020	Accumulated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual	Accrual Rate	Notes
			(1)	(2)	(3)	(4)= (1) x (3)	(5)= (1)-(2)-(4)	(6)	(7) =(5)/(6)	(8)= (7)/(1)	
Pawnee Common	311	Structures and Improvements	20,560,345	8,155,110	-125.40%	(25,782,166)	38,187,402	20.46	1,866,784	9.08%	
Pawnee Common	312	Boiler Plant Equipment	25,954,446	19,224,340	-127.44%	(33,077,462)	39,807,568	18.84	2,112,897	8.14%	
Pawnee Common	314	Turbogenerator Units	309,543	254,478	-127.08%	(393,366)	448,432	19.33	23,199	7.49%	
Pawnee Common	315	Accessory Electric Equipment	938,730	398,830	0.00%	0	539,901	19.82	27,233	2.90%	
Pawnee Common	315.2	Computers and Peripherals	465,779	394,604	0.00%	0	71,175	1.38	51,753	11.11%	(3)
Pawnee Common	316	Miscellaneous Equipment	2,950,489	2,205,096	-126.22%	(3,724,177)	4,469,570	18.29	244,438	8.28%	
Pawnee Common - Total/Composite			51,179,333	30,632,457		(62,977,172)	83,524,048		4,326,305	8.45%	
Zuni Common	310.2	Land Rights	586,847	586,847	0.00%	0	0	0.00	0	0.00%	
Zuni Common - Total/Composite			586,847	586,847		0	0		0		
Total Steam Production			3,151,855,493	1,247,302,155		(294,001,785)	2,198,555,124		114,639,560	3.64%	
HYDRAULIC PRODUCTION											
Ames	331	Structures & Improvements	399,964	90,914	-58.81%	(235,222)	544,271	26.59	20,466	5.12%	
Ames	332	Reservoirs, Dams & Waterways	9,790,217	2,773,978	-59.42%	(5,817,808)	12,834,047	27.68	463,656	4.74%	
Ames	333	Waterwheels, Turbines & Generators	156,202	82,554	-59.86%	(93,501)	167,150	18.20	9,185	5.88%	
Ames	334	Accessory Electric Equipment	1,760,800	653,351	-61.54%	(1,083,549)	2,190,998	24.39	89,849	5.10%	
Ames	334.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	11.11%	(2)
Ames	335	Misc. Power Plant Equipment	102,063	40,660	-59.24%	(60,457)	121,860	25.34	4,810	4.71%	
Ames	335.2	Recreational Facilities	168,012	67,805	-59.19%	(99,450)	199,657	25.53	7,819	4.65%	
Ames	336	Roads, Railroads & Bridges	21,231	7,745	-57.97%	(12,307)	25,792	26.04	991	4.67%	
Ames - Total/Composite			12,398,488	3,717,007		(7,402,295)	16,083,776		596,774	4.81%	
Cabin Creek	331	Structures & Improvements	20,153,917	6,810,080	-68.76%	(13,858,119)	27,201,955	28.09	968,234	4.80%	
Cabin Creek	332	Reservoirs, Dams & Waterways	21,375,865	13,316,799	-71.49%	(15,281,485)	23,340,551	20.21	1,154,961	5.40%	
Cabin Creek	333	Waterwheels, Turbines & Generators	19,676,896	9,882,074	-70.17%	(13,806,849)	23,601,671	23.30	1,012,948	5.15%	
Cabin Creek	334	Accessory Electric Equipment	4,738,508	2,182,333	-69.82%	(3,308,470)	5,864,644	22.07	265,720	5.61%	
Cabin Creek	334.2	Computers & Peripherals	56,206	56,206	0.00%	0	0	0.00	0	11.11%	(3)
Cabin Creek	335	Misc. Power Plant Equipment	696,051	292,504	-67.40%	(469,168)	872,715	25.84	33,775	4.85%	
Cabin Creek	335.2	Recreational Facilities	3,927	1,815	-67.55%	(2,653)	4,765	26.88	177	4.51%	
Cabin Creek	336	Roads, Railroads & Bridges	453,762	282,441	-65.56%	(297,507)	468,828	19.30	24,294	5.35%	
Cabin Creek - Total/Composite			67,155,131	32,824,252		(47,024,250)	81,355,129		3,460,108	5.15%	
Georgetown	331	Structures & Improvements	147,604	65,423	-30.47%	(44,971)	127,152	15.00	8,478	5.74%	
Georgetown	332	Reservoirs, Dams & Waterways	20,294,802	4,584,380	-30.28%	(6,145,292)	21,855,714	15.29	1,429,237	7.04%	
Georgetown	333	Waterwheels, Turbines & Generators	384,215	38,495	-30.24%	(116,193)	461,913	14.77	31,268	8.14%	
Georgetown	334	Accessory Electric Equipment	522,378	217,870	-31.51%	(164,604)	469,111	13.67	34,316	6.57%	
Georgetown	334.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	11.11%	(2)
Georgetown	335	Misc. Power Plant Equipment	1,317	694	-30.97%	(408)	1,031	13.52	76	5.79%	
Georgetown	335.2	Recreational Facilities	240,335	105,213	-30.58%	(73,504)	208,627	14.54	14,346	5.97%	
Georgetown	336	Roads, Railroads & Bridges	0	0	0.00%	0	0	0.00	0	7.03%	(1)
Georgetown - Total/Composite			21,590,651	5,012,075		(6,544,973)	23,123,548		1,517,722	7.03%	
Salida	331	Structures & Improvements	82,936	130,485	-279.39%	(231,717)	184,169	6.10	30,199	36.41%	
Salida	332	Reservoirs, Dams & Waterways	2,704,463	3,656,629	-279.26%	(7,552,602)	6,600,437	6.32	1,044,970	38.64%	
Salida	333	Waterwheels, Turbines & Generators	24,873	47,384	-279.67%	(69,561)	47,050	5.14	9,149	36.78%	
Salida	334	Accessory Electric Equipment	273,607	428,411	-279.76%	(765,443)	610,639	6.09	100,304	36.66%	
Salida	334.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	11.11%	(2)
Salida	335	Misc. Power Plant Equipment	1,900	3,565	-279.73%	(5,315)	3,650	5.92	617	32.47%	
Salida	335.2	Recreational Facilities	151,492	238,424	-279.30%	(423,118)	336,187	6.40	52,551	34.69%	
Salida	336	Roads, Railroads & Bridges	20,450	33,275	-279.16%	(57,088)	44,263	6.01	7,366	36.02%	
Salida - Total/Composite			3,259,721	4,538,173		(9,104,845)	7,826,394		1,245,155	38.20%	
Shoshone	331	Structures & Improvements	4,215,418	577,922	-5.74%	(242,025)	3,879,521	36.47	106,363	2.52%	
Shoshone	332	Reservoirs, Dams & Waterways	16,859,400	3,454,035	-6.75%	(1,138,795)	14,544,160	29.74	489,104	2.90%	
Shoshone	333	Waterwheels, Turbines & Generators	3,668,464	724,118	-8.67%	(318,233)	3,262,578	30.35	107,486	2.93%	
Shoshone	334	Accessory Electric Equipment	3,331,273	640,346	-9.40%	(313,293)	3,004,220	29.57	101,581	3.05%	
Shoshone	334.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	11.11%	(2)
Shoshone	335	Misc. Power Plant Equipment	878,735	181,963	-6.62%	(58,205)	754,977	33.96	22,228	2.53%	
Shoshone	335.2	Recreational Facilities	0	0	0.00%	0	0	0.00	0	2.86%	(1)
Shoshone	336	Roads, Railroads & Bridges	9,247	3,880	-5.30%	(490)	5,857	16.78	349	3.77%	
Shoshone - Total/Composite			28,962,536	5,582,265		(2,071,041)	25,451,312		827,111	2.86%	

PUBLIC SERVICE OF COLORADO
COMPUTATION OF DEPRECIATION ACCRUAL RATE
AT DECEMBER 31, 2020

Plant or Unit	Account No.	Description	Surviving Balance 12/31/2020 (1)	Accumulated Depreciation 12/31/2020 (2)	Net Salvage % (3)	Net Salvage Amount (4)= (1) x (3)	Unaccrued Balance (5)= (1)- (2)-(4)	Remaining Life (6)	Annual Accrual (7) =(5)/(6)	Accrual Rate (8)= (7)/(1)	Notes
Tacoma	331	Structures & Improvements	310,681	86,425	-40.11%	(124,602)	348,858	29.26	11,923	3.84%	
Tacoma	332	Reservoirs, Dams & Waterways	17,318,247	2,639,592	-40.51%	(7,016,294)	21,694,949	28.68	756,472	4.37%	
Tacoma	333	Waterwheels, Turbines & Generators	1,214,415	425,338	-43.13%	(523,737)	1,312,814	25.71	51,070	4.21%	
Tacoma	334	Accessory Electric Equipment	2,876,031	716,187	-42.46%	(1,221,178)	3,381,022	25.17	134,335	4.67%	
Tacoma	334.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	11.11%	(2)
Tacoma	335	Misc. Power Plant Equipment	213,111	80,388	-41.47%	(88,372)	221,095	24.71	8,948	4.20%	
Tacoma	335.2	Recreational Facilities	478,920	206,133	-41.57%	(199,064)	471,851	23.96	19,695	4.11%	
Tacoma	336	Roads, Railroads & Bridges	270,175	129,147	-39.77%	(107,442)	248,470	21.36	11,631	4.31%	
Tacoma - Total/Composite			22,681,580	4,283,210		(9,280,689)	27,679,059		994,074	4.38%	
Total Hydraulic Production			156,048,107	55,956,982		(81,428,093)	181,519,218		8,640,944	5.54%	
OTHER PRODUCTION PLANT											
Alamosa	341	Structures and Improvements	526,020	411,604	-7.62%	(40,090)	154,506	5.44	28,400	5.40%	
Alamosa	342	Fuel Holders, Producers, and Accessories	331,421	314,579	-7.60%	(25,185)	42,026	5.24	8,016	2.42%	
Alamosa	343	Prime Movers	0	0	0.00%	0	0	0.00	0	4.10%	(1)
Alamosa	344	Generators	7,625,547	6,868,041	-7.72%	(588,782)	1,346,288	5.31	253,644	3.33%	
Alamosa	345	Accessory Electric Equipment	994,564	619,480	-7.52%	(74,761)	449,845	5.46	82,437	8.29%	
Alamosa	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Alamosa	346	Miscellaneous Power Plant Equipment	296,893	166,503	-7.64%	(22,695)	153,086	5.33	28,714	9.67%	
Alamosa - Total/Composite			9,774,446	8,380,207		(751,513)	2,145,751		401,210	4.10%	
Blue Spruce	341	Structures and Improvements	0	0	0.00%	0	0	0.00	0	2.94%	(1)
Blue Spruce	342	Fuel Holders, Producers, and Accessories	0	0	0.00%	0	0	0.00	0	2.94%	(1)
Blue Spruce	343	Prime Movers	0	0	0.00%	0	0	0.00	0	2.94%	(1)
Blue Spruce	344	Generators	218,253,183	55,721,611	-3.80%	(8,289,122)	170,820,694	26.61	6,418,267	2.94%	
Blue Spruce	345	Accessory Electric Equipment	923,556	138,601	-3.55%	(32,809)	817,763	28.02	29,181	3.16%	
Blue Spruce	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Blue Spruce	346	Miscellaneous Power Plant Equipment	0	0	0.00%	0	0	0.00	0	2.94%	(1)
Blue Spruce - Total/Composite			219,176,738	55,860,213		(8,321,931)	171,638,457		6,447,448	2.94%	
Cherokee 5-7	341	Structures and Improvements	126,064,022	18,094,957	-3.82%	(4,817,454)	112,786,520	32.71	3,447,944	2.74%	
Cherokee 5-7	342	Fuel Holders, Producers, and Accessories	5,680,939	818,754	-1.91%	(108,598)	4,970,783	33.22	149,649	2.63%	
Cherokee 5-7	343	Prime Movers	131,493,260	17,661,363	-3.84%	(5,044,884)	118,876,781	30.16	3,941,055	3.00%	
Cherokee 5-7	344	Generators	244,245,248	31,644,727	-3.56%	(8,701,019)	221,301,541	30.87	7,168,920	2.94%	
Cherokee 5-7	345	Accessory Electric Equipment	63,675,645	9,196,451	-3.48%	(2,214,069)	56,693,263	32.27	1,757,029	2.76%	
Cherokee 5-7	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Cherokee 5-7	346	Miscellaneous Power Plant Equipment	27,526,672	5,327,064	-8.79%	(2,418,557)	24,618,165	24.27	1,014,232	3.68%	
Cherokee 5-7 - Total/Composite			596,685,786	82,743,315		(23,304,581)	539,247,052		17,478,828	2.92%	
Fruita	340.2	Land Rights	452	406	0.00%	0	46	5.50	8	1.85%	
Fruita	341	Structures and Improvements	92,014	87,208	-10.84%	(9,976)	14,782	5.34	2,768	3.01%	
Fruita	342	Fuel Holders, Producers, and Accessories	599,152	490,012	-10.18%	(61,017)	170,157	5.38	31,656	5.28%	
Fruita	343	Prime Movers	0	0	0.00%	0	0	0.00	0	4.23%	(1)
Fruita	344	Generators	2,512,252	2,305,142	-10.49%	(263,432)	470,542	5.30	88,779	3.53%	
Fruita	345	Accessory Electric Equipment	74,773	56,527	-10.33%	(7,721)	25,967	5.42	4,793	6.41%	
Fruita	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Fruita	346	Miscellaneous Power Plant Equipment	200,385	119,844	-10.41%	(20,856)	101,396	5.32	19,064	9.51%	
Fruita - Total/Composite			3,479,028	3,059,140		(363,002)	782,890		147,069	4.23%	
Ft Saint Vrain Unit 1	341	Structures and Improvements	22,903,499	15,312,798	-5.09%	(1,165,328)	8,756,030	18.57	471,396	2.06%	
Ft Saint Vrain Unit 1	342	Fuel Holders, Producers, and Accessories	3,664,793	2,008,930	-2.93%	(107,216)	1,763,079	18.74	94,096	2.57%	
Ft Saint Vrain Unit 1	343	Prime Movers	4,065,900	496,803	-3.02%	(122,945)	3,692,042	19.06	193,757	4.77%	
Ft Saint Vrain Unit 1	344	Generators	78,003,472	40,729,406	-3.29%	(2,566,160)	39,840,226	18.60	2,141,580	2.75%	
Ft Saint Vrain Unit 1	345	Accessory Electric Equipment	21,305,835	10,611,202	-3.27%	(696,388)	11,391,022	18.68	609,647	2.86%	
Ft Saint Vrain Unit 1	345.2	Computers and Peripherals	95,966	95,966	0.00%	0	0	0.00	0	16.67%	(3)
Ft Saint Vrain Unit 1	346	Miscellaneous Power Plant Equipment	3,788,835	3,229,880	-5.03%	(190,561)	749,516	5.59	134,195	3.54%	
Ft Saint Vrain Unit 1 - Total/Composite			133,823,301	72,484,985		(4,848,598)	66,191,915		3,644,671	2.72%	
Ft Saint Vrain Unit 2	341	Structures and Improvements	30,833	4,005	0.00%	0	26,828	20.04	1,339	4.34%	
Ft Saint Vrain Unit 2	342	Fuel Holders, Producers, and Accessories	594,312	149,964	-2.62%	(15,586)	459,934	20.18	22,797	3.84%	
Ft Saint Vrain Unit 2	343	Prime Movers	2,779,822	637,817	-3.82%	(106,117)	2,248,122	18.00	118,328	4.26%	
Ft Saint Vrain Unit 2	344	Generators	86,584,175	39,413,816	-3.87%	(3,352,442)	50,522,801	18.89	2,675,149	3.09%	
Ft Saint Vrain Unit 2	345	Accessory Electric Equipment	1,968,283	488,500	-3.55%	(69,854)	1,549,638	19.85	78,073	3.97%	
Ft Saint Vrain Unit 2	345.2	Computers and Peripherals	1,818,121	1,366,574	0.00%	0	451,547	1.49	303,020	16.67%	(3)
Ft Saint Vrain Unit 2	346	Miscellaneous Power Plant Equipment	538,315	113,268	-5.07%	(27,311)	452,358	18.17	24,894	4.62%	
Ft Saint Vrain Unit 2 - Total/Composite			94,313,861	42,173,943		(3,571,310)	55,711,228		3,223,599	3.42%	

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Plant or Unit	Account No.	Description	Surviving Balance 12/31/2020	Accumulated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual	Accrual Rate	Notes
			(1)	(2)	(3)	(4)= (1) x (3)	(5)= (1)- (2)-(4)	(6)	(7) =(5)/(6)	(8)= (7)/(1)	
Ft Saint Vrain Unit 3	341	Structures and Improvements	0	0	0.00%	0	0	0.00	0	4.50%	(1)
Ft Saint Vrain Unit 3	342	Fuel Holders, Producers, and Accessories	659,565	148,379	-6.68%	(44,078)	555,264	20.22	27,458	4.16%	
Ft Saint Vrain Unit 3	343	Prime Movers	4,759,486	1,291,712	-7.91%	(376,681)	3,844,455	18.98	202,522	4.26%	
Ft Saint Vrain Unit 3	344	Generators	28,404,319	5,570,286	-7.66%	(2,174,835)	25,008,868	19.32	1,294,665	4.56%	
Ft Saint Vrain Unit 3	345	Accessory Electric Equipment	633,752	190,424	-7.66%	(48,552)	491,879	19.80	24,836	3.92%	
Ft Saint Vrain Unit 3	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Ft Saint Vrain Unit 3	346	Miscellaneous Power Plant Equipment	44,486	5,583	-8.67%	(3,858)	42,760	18.65	2,292	5.15%	
Ft Saint Vrain Unit 3 - Total/Composite			34,501,608	7,206,385		(2,648,003)	29,943,226		1,551,774	4.50%	
Ft Saint Vrain Unit 4	341	Structures and Improvements	3,062,941	1,995,271	-4.94%	(151,367)	1,219,036	18.64	65,397	2.14%	
Ft Saint Vrain Unit 4	342	Fuel Holders, Producers, and Accessories	27,606,186	13,658,266	-2.13%	(588,093)	14,536,013	19.66	739,538	2.68%	
Ft Saint Vrain Unit 4	343	Prime Movers	2,761,168	319,471	-3.00%	(82,934)	2,524,631	19.07	132,374	4.79%	
Ft Saint Vrain Unit 4	344	Generators	93,927,607	33,826,988	-3.00%	(2,815,315)	62,915,933	19.03	3,305,511	3.52%	
Ft Saint Vrain Unit 4	345	Accessory Electric Equipment	7,848,198	3,650,341	-3.02%	(236,819)	4,434,676	19.38	228,860	2.92%	
Ft Saint Vrain Unit 4	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Ft Saint Vrain Unit 4	346	Miscellaneous Power Plant Equipment	17,384	10,251	-7.65%	(1,330)	8,463	13.32	636	3.66%	
Ft Saint Vrain Unit 4 - Total/Composite			135,223,484	53,460,590		(3,875,858)	85,638,752		4,472,315	3.31%	
Ft Saint Vrain Unit 5	341	Structures and Improvements	7,455,783	2,186,366	-2.40%	(178,760)	5,448,177	27.07	201,255	2.70%	
Ft Saint Vrain Unit 5	342	Fuel Holders, Producers, and Accessories	2,200,775	648,343	-0.70%	(15,306)	1,567,739	27.35	57,320	2.60%	
Ft Saint Vrain Unit 5	343	Prime Movers	1,327,090	184,423	-2.14%	(28,402)	1,171,070	25.61	45,726	3.45%	
Ft Saint Vrain Unit 5	344	Generators	59,827,684	16,797,775	-2.08%	(1,243,039)	44,272,949	25.75	1,719,524	2.87%	
Ft Saint Vrain Unit 5	345	Accessory Electric Equipment	12,563,319	3,625,448	-1.38%	(173,417)	9,111,288	26.70	341,276	2.72%	
Ft Saint Vrain Unit 5	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Ft Saint Vrain Unit 5	346	Miscellaneous Power Plant Equipment	644,763	227,578	-7.01%	(45,206)	462,391	19.66	23,516	3.65%	
Ft Saint Vrain Unit 5 - Total/Composite			84,018,415	23,669,932		(1,684,131)	62,033,613		2,388,616	2.84%	
Ft Saint Vrain Unit 6	341	Structures and Improvements	7,364,719	2,160,749	-2.40%	(176,638)	5,380,608	27.07	198,762	2.70%	
Ft Saint Vrain Unit 6	342	Fuel Holders, Producers, and Accessories	2,477,944	729,998	-0.70%	(17,242)	1,765,187	27.35	64,539	2.60%	
Ft Saint Vrain Unit 6	343	Prime Movers	1,327,207	185,607	-2.14%	(28,418)	1,170,017	25.61	45,687	3.44%	
Ft Saint Vrain Unit 6	344	Generators	62,860,470	17,223,868	-2.07%	(1,300,053)	46,936,655	25.76	1,821,727	2.90%	
Ft Saint Vrain Unit 6	345	Accessory Electric Equipment	9,197,849	2,697,691	-1.99%	(183,070)	6,683,227	26.69	250,409	2.72%	
Ft Saint Vrain Unit 6	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Ft Saint Vrain Unit 6	346	Miscellaneous Power Plant Equipment	631,726	234,251	-7.18%	(45,347)	442,821	19.29	22,951	3.63%	
Ft Saint Vrain Unit 6 - Total/Composite			83,859,913	23,232,164		(1,750,766)	62,378,516		2,404,075	2.87%	
Ft Saint Vrain Common	341	Structures and Improvements	13,330,432	5,775,647	-21.34%	(2,844,587)	10,399,372	26.14	397,828	2.98%	
Ft Saint Vrain Common	342	Fuel Holders, Producers, and Accessories	1,911,610	995,965	-20.35%	(388,975)	1,304,620	24.53	53,178	2.78%	
Ft Saint Vrain Common	343	Prime Movers	923,842	273,180	-20.95%	(193,567)	844,228	25.37	33,272	3.60%	
Ft Saint Vrain Common	344	Generators	43,015,810	22,499,667	-21.28%	(9,152,098)	29,668,241	24.79	1,196,642	2.78%	
Ft Saint Vrain Common	345	Accessory Electric Equipment	17,395,546	7,270,257	-20.97%	(3,648,646)	13,773,934	25.78	534,365	3.07%	
Ft Saint Vrain Common	345.2	Computers and Peripherals	403,578	214,674	0.00%	0	188,904	2.81	67,263	16.67%	(3)
Ft Saint Vrain Common	346	Miscellaneous Power Plant Equipment	1,753,887	485,998	-24.53%	(430,190)	1,698,080	21.58	78,680	4.49%	
Ft Saint Vrain Common - Total/Composite			78,734,705	37,515,389		(16,658,062)	57,877,378		2,361,228	3.00%	
Ft. Lupton CT	341	Structures and Improvements	191,963	168,660	-9.15%	(17,565)	40,868	5.40	7,566	3.94%	
Ft. Lupton CT	342	Fuel Holders, Producers, and Accessories	350,190	301,548	-8.74%	(30,601)	79,243	5.40	14,682	4.19%	
Ft. Lupton CT	343	Prime Movers	0	0	0.00%	0	0	0.00	0	4.94%	(1)
Ft. Lupton CT	344	Generators	12,539,804	10,439,719	-8.95%	(1,121,822)	3,221,908	5.37	599,545	4.78%	
Ft. Lupton CT	345	Accessory Electric Equipment	682,730	428,975	-8.86%	(60,516)	314,271	5.45	57,697	8.45%	
Ft. Lupton CT	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Ft. Lupton CT	346	Miscellaneous Power Plant Equipment	4,773	3,408	-9.55%	(456)	1,821	3.11	585	12.26%	
Ft. Lupton CT - Total/Composite			13,769,460	11,342,309		(1,230,959)	3,658,110		680,076	4.94%	
Rocky Mountain	341	Structures and Improvements	8,956,582	1,388,513	-6.98%	(625,570)	8,193,639	28.31	289,461	3.23%	
Rocky Mountain	342	Fuel Holders, Producers, and Accessories	2,279,742	333,604	-5.48%	(124,860)	2,070,998	28.78	71,967	3.16%	
Rocky Mountain	343	Prime Movers	7,982,369	845,434	-7.17%	(572,241)	7,709,175	26.45	291,411	3.65%	
Rocky Mountain	344	Generators	408,620,837	101,567,164	-7.07%	(28,884,093)	335,937,766	26.65	12,604,755	3.08%	
Rocky Mountain	345	Accessory Electric Equipment	2,119,562	480,791	-6.93%	(146,908)	1,785,678	27.81	64,209	3.03%	
Rocky Mountain	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Rocky Mountain	346	Miscellaneous Power Plant Equipment	774,543	92,168	-10.07%	(77,960)	760,334	23.74	32,024	4.13%	
Rocky Mountain - Total/Composite			430,733,634	104,707,675		(30,431,632)	356,457,591		13,353,828	3.10%	
Valmont 6	341	Structures and Improvements	15,622,333	11,513,145	-0.97%	(151,502)	4,260,690	5.37	793,303	5.08%	
Valmont 6	342	Fuel Holders, Producers, and Accessories	1,161,386	959,842	-0.61%	(7,129)	208,673	5.42	38,526	3.32%	
Valmont 6	343	Prime Movers	0	0	0.00%	0	0	0.00	0	5.08%	(1)
Valmont 6	344	Generators	9,251,296	6,805,130	-0.88%	(81,683)	2,527,849	5.34	473,099	5.11%	
Valmont 6	345	Accessory Electric Equipment	2,133,217	1,466,630	-0.82%	(17,452)	684,039	5.39	126,804	5.94%	
Valmont 6	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Valmont 6	346	Miscellaneous Power Plant Equipment	82,117	71,920	-1.75%	(1,440)	11,637	3.69	3,152	3.84%	
Valmont 6 - Total/Composite			28,250,349	20,816,666		(259,205)	7,692,888		1,434,884	5.08%	

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Plant or Unit	Account No.	Description	Surviving Balance 12/31/2020	Accumulated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual	Accrual Rate	Notes
			(1)	(2)	(3)	(4)= (1) x (3)	(5)= (1)- (2)-(4)	(6)	(7) =(5)/(6)	(8)= (7)/(1)	
Valmont 7 & 8	341	Structures and Improvements	3,429,684	105,336	-7.91%	(271,408)	3,595,756	17.22	208,799	6.09%	
Valmont 7 & 8	342	Fuel Holders, Producers, and Accessories	1,347,748	40,689	-7.32%	(98,670)	1,405,730	17.40	80,770	5.99%	
Valmont 7 & 8	343	Prime Movers	0	0	0.00%	0	0	0.00	0	6.12%	(1)
Valmont 7 & 8	344	Generators	6,923,940	219,729	-8.10%	(560,596)	7,264,807	16.75	433,783	6.26%	
Valmont 7 & 8	345	Accessory Electric Equipment	7,940,596	387,281	-8.08%	(641,284)	8,194,599	17.16	477,645	6.02%	
Valmont 7 & 8	345.2	Computers and Peripherals	0	0	0.00%	0	0	0.00	0	16.67%	(2)
Valmont 7 & 8	346	Miscellaneous Power Plant Equipment	162,661	5,632	-8.55%	(13,913)	170,942	16.51	10,355	6.37%	
		Valmont 7 & 8 - Total/Composite	19,804,631	758,667		(1,585,871)	20,631,835		1,211,353	6.12%	
Wind to Hydrogen	344	Generators	1,017,482	964,248	0.00%	0	53,235	1.00	53,235	5.23%	
		Wind to Hydrogen - Total/Composite	1,017,482	964,248		0	53,235		53,235		
		Total Other Production	1,969,172,841	548,375,827		(101,285,424)	1,522,082,438		61,254,206	3.11%	
WIND PRODUCTION											
Cheyenne Ridge WF	340.2	Land Rights	0	0	0.00%	0	0	0.00	0	4.00%	(1)
Cheyenne Ridge WF	341	Structures and Improvements	26,510,642	430,326	-2.40%	(636,462)	26,716,778	24.50	1,090,481	4.11%	
Cheyenne Ridge WF	342	Fuel Holders, Producers, and Accessories	0	0	0.00%	0	0	0.00	0	4.11%	(1)
Cheyenne Ridge WF	344	Generators	589,177,653	9,563,640	-2.40%	(14,144,851)	593,758,865	24.50	24,235,056	4.11%	
Cheyenne Ridge WF	345	Accessory Electric Equipment	0	0	0.00%	0	0	0.00	0	4.11%	(1)
Cheyenne Ridge WF	346	Miscellaneous Power Plant Equipment	39,107,591	634,590	-2.40%	(938,887)	39,411,888	24.50	1,608,648	4.11%	
		Cheyenne Ridge WF - Total/Composite	654,795,885	10,628,555		(15,720,200)	659,887,530		26,934,185	4.11%	
Rush Creek WF	340.2	Land Rights	0	0	0.00%	0	0	0.00	0	4.00%	(1)
Rush Creek WF	341	Structures and Improvements	0	0	0.00%	0	0	0.00	0	4.14%	(1)
Rush Creek WF	342	Fuel Holders, Producers, and Accessories	0	0	0.00%	0	0	0.00	0	4.14%	(1)
Rush Creek WF	344	Generators	897,481,357	79,442,536	-1.98%	(17,813,085)	835,851,906	22.50	37,148,974	4.14%	
Rush Creek WF	345	Accessory Electric Equipment	18,379	631	-1.98%	(365)	18,112	22.50	805	4.38%	
Rush Creek WF	346	Miscellaneous Power Plant Equipment	0	0	0.00%	0	0	0.00	0	4.14%	(1)
		Rush Creek WF - Total/Composite	897,499,736	79,443,168		(17,813,450)	835,870,019		37,149,779	4.14%	
		Total Wind Production	1,552,295,622	90,071,723		(33,533,650)	1,495,757,549		64,083,964	4.13%	
		Total Production	6,829,372,062	1,941,706,687		(510,248,952)	5,397,914,328		248,618,674	3.64%	
TRANSMISSION											
	350.2	Land Rights	96,124,140	15,644,561	0.00%	0	80,479,579	82.35	977,231	1.02%	
	352	Structures and Improvements	140,331,126	20,794,894	-10.00%	(14,033,113)	133,569,345	51.24	2,606,899	1.86%	
	353	Station Equipment	1,254,947,887	246,836,487	-20.00%	(250,989,577)	1,259,100,976	47.69	26,400,067	2.10%	
	354	Towers and Fixtures	162,448,132	77,462,172	-20.00%	(32,489,626)	117,475,586	46.10	2,548,060	1.57%	
	355	Poles and Fixtures	713,704,510	122,213,051	-60.00%	(428,222,706)	1,019,714,165	54.81	18,605,875	2.61%	
	356	Overhead Conductors and Devices	395,884,944	74,626,989	-30.00%	(118,765,483)	440,023,439	63.21	6,961,381	1.76%	
	357	Underground Conduit	47,278,487	8,755,677	-5.00%	(2,363,924)	40,886,734	52.57	777,748	1.65%	
	358	Underground Conductors and Devices	72,023,257	18,694,624	-5.00%	(3,601,163)	56,929,796	36.60	1,555,482	2.16%	
	359	Roads and Trails	3,949,563	1,381,397	0.00%	0	2,568,166	57.11	44,966	1.14%	
		Total Transmission	2,886,692,046	586,409,851		(850,465,593)	3,150,747,787		60,477,708	2.10%	
DISTRIBUTION											
	360.2	Land Rights	48,034,185	5,455,557	0.00%	0	42,578,628	82.87	513,825	1.07%	
	361	Structures and Improvements	100,313,565	21,540,215	-10.00%	(10,031,356)	88,804,706	50.05	1,774,270	1.77%	
	362	Station Equipment	743,061,487	196,604,884	-20.00%	(148,612,297)	695,068,900	43.81	15,865,531	2.14%	
	363	Energy Storage Equipment	0	0	0.00%	0	0	0.00	0	10.00%	(2)
	364	Poles, Towers and Fixtures	470,714,126	125,569,680	-60.00%	(282,428,476)	627,572,921	47.62	13,179,407	2.80%	
	365	Overhead Conductors and Devices	459,383,325	98,641,067	-50.00%	(229,691,663)	590,433,921	48.09	12,278,757	2.67%	
	366	Underground Conduit	493,902,587	117,858,214	-30.00%	(148,170,776)	524,215,149	59.77	8,770,386	1.78%	
	367	Underground Conductors and Devices	2,029,768,356	498,507,557	-10.00%	(202,976,836)	1,734,237,635	39.76	43,619,460	2.15%	
	368	Line Transformers	631,352,446	184,256,288	-10.00%	(63,135,245)	510,231,402	36.17	14,108,264	2.23%	
	369	Services	23,234,652	23,005,394	-40.00%	(9,293,861)	9,523,119	16.90	563,511	2.43%	
	369.1	Services-Overhead	53,410,962	26,313,859	-40.00%	(21,364,385)	48,461,487	36.54	1,326,094	2.48%	
	369.2	Services-Underground	245,578,470	141,645,955	-40.00%	(98,231,388)	202,163,903	33.22	6,085,104	2.48%	
	370	Meters	164,096,208	75,362,667	0.00%	0	88,733,541	13.12	6,764,118	4.12%	
	370.2	Meters - AGIS - AMI Equipment	8,551,008	588,887	0.00%	0	7,962,122	18.64	427,148	5.00%	

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COMPUTATION OF DEPRECIATION ACCRUAL RATE
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Plant or Unit	Account No.	Description	Surviving Balance 12/31/2020	Accumulated Depreciation 12/31/2020	Net Salvage %	Net Salvage Amount	Unaccrued Balance	Remaining Life	Annual Accrual	Accrual Rate	Notes
			(1)	(2)	(3)	(4)= (1) x (3)	(5)= (1)-(2)-(4)	(6)	(7) =(5)/(6)	(8)= (7)/(1)	
	370.65	Meters-AMR	71,651,601	64,548,254	0.00%	0	7,103,347	1.01	7,053,073	9.84%	
	371	Installation on Customer Premises	6,551,765	4,444,892	-20.00%	(1,310,353)	3,417,226	11.05	309,355	4.72%	
	371.40	Installations on Customer's Premises-EV	0	0	0.00%	0	0	0.00	0	10.00%	(2)
	373	Street Lighting and Signal Systems	179,254,398	66,945,996	-25.00%	(44,813,600)	157,122,002	19.74	7,959,192	4.44%	
		Total Distribution	5,728,859,142	1,651,289,366		(1,260,060,235)	5,337,630,010		140,597,496	2.45%	
<u>ELECTRIC GENERAL</u>											
	389.2	Land Rights									
	390	Structures and Improvements	11,906,292	1,901,965	-10.00%	(1,190,629)	11,194,955	37.55	298,163	2.50%	
		Total Electric General	11,906,292	1,901,965		(1,190,629)	11,194,955		298,163	2.50%	
<u>COMMON GENERAL</u>											
	389.2	Land Rights	0	0							
	390.0	Structures and Improvements	188,650,268	49,467,823	-10.00%	(18,865,027)	158,047,471	33.95	4,655,269	2.47%	
		Total Common General	188,650,268	49,467,823		(18,865,027)	158,047,471		4,655,269	2.47%	

Notes:

- (1) There is currently no balance in these accounts. In the event plant is added to these accounts, PSCo requests authorization to use the depreciation rate listed, which represents the composite depreciation rate for each unit.
(2) There is currently no balance in this account. When plant is recorded to this account, PSCo requests authorization to use the depreciation rate listed, which represents the whole life rate.
(3) There is a small balance in this account with a short remaining life or no remaining net book value. PSCo requests authorization to use the depreciation rate listed, which represents the whole life rate and cease accrual if there is no remaining net book value.

PUBLIC SERVICE OF COLORADO
COMPUTATION OF AMORTIZATION RATES
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Account Number	Description	Plant Balance 12/31/2020	Allocated Reserve 12/31/2020	Theoretical Reserve 12/31/2020	Reserve Difference	Assets to Retire
ELECTRIC GENERAL						
391.00	Office Furniture and Equipment	7,849,337	2,511,293	2,798,833	(287,539)	465,766
391.20	Computer Hardware	27,086,580	9,931,937	11,328,067	(1,396,130)	0
392.10	Transportation Equipment - Automobiles	965,002	628,181	700,703	(72,522)	124,738
392.20	Transportation Equipment - Light Trucks	29,920,392	13,246,033	14,150,867	(904,834)	7,565,698
392.30	Transportation Equipment - Trailers	7,636,594	2,017,737	2,301,370	(283,633)	0
392.40	Transportation Equipment - Heavy Trucks	64,664,121	28,349,393	30,688,177	(2,338,784)	16,053,428
393.00	Stores Equipment	156,423	79,004	90,109	(11,106)	0
394.00	Tools, Shop and Garage Equipment	52,429,112	22,485,357	24,862,849	(2,377,492)	5,572,106
395.00	Laboratory Equipment	2,102,610	1,109,095	1,245,000	(135,905)	142,283
396.00	Power Operated Equipment	11,411,266	5,389,765	5,641,038	(251,273)	5,225,337
397.00	Communication Equipment	194,847,615	54,484,166	61,275,516	(6,791,350)	6,171,160
398.00	Miscellaneous Equipment	1,579,247	718,869	818,023	(99,153)	13,502
		400,648,298	140,950,831	155,900,552	(14,949,722)	41,334,017

After Retirement of Fully Accrued Assets

	Plant Balance 12/31/2020	Allocated Reserve 12/31/2020	Amortization Life	Amortization Net Salvage %	Amortization Rate	Annual Amortization
391 Office Furniture and Equipment	7,383,571	2,045,527	20	0.00%	5.00%	369,179
391.2 Computer Hardware	27,086,580	9,931,937	6	0.00%	16.67%	4,514,430
392.1 Transportation Equipment - Automobiles	840,264	503,442	7	10.00%	12.86%	108,034
392.2 Transportation Equipment - Light Trucks	22,354,695	5,680,335	7	10.00%	12.86%	2,874,175
392.3 Transportation Equipment - Trailers	7,636,594	2,017,737	15	20.00%	5.33%	407,285
392.4 Transportation Equipment - Heavy Trucks	48,610,693	12,295,965	10	10.00%	9.00%	4,374,962
393 Stores Equipment	156,423	79,004	30	0.00%	3.33%	5,214
394 Tools, Shop and Garage Equipment	46,857,007	16,913,251	15	0.00%	6.67%	3,123,800
395 Laboratory Equipment	1,960,327	966,812	10	0.00%	10.00%	196,033
396 Power Operated Equipment	6,185,929	164,428	10	30.00%	7.00%	433,015
397 Communication Equipment	188,676,455	48,313,007	15	0.00%	6.67%	12,578,430
398 Miscellaneous Equipment	1,565,744	705,367	20	0.00%	5.00%	78,287
General Plant Reserve Deficiency	See Note (1)					1,494,972
Total Electric General Amortized	359,314,281	99,616,813				30,557,817

Note:
(1) 10 year amortization for general plant reserve deficiency proposed

PUBLIC SERVICE OF COLORADO
COMPUTATION OF AMORTIZATION RATES
AT DECEMBER 31, 2020

Account Number	Description	Plant Balance 12/31/2020	Allocated Reserve 12/31/2020	Theoretical Reserve 12/31/2020	Reserve Difference	Assets to Retire
COMMON GENERAL						
391.00	Office Furniture and Equipment	27,998,991	12,789,158	13,173,763	(384,605)	0
391.20	Computer Hardware	170,911,026	84,303,494	86,651,620	(2,348,126)	6,221,899
392.10	Transportation Equipment - Automobiles	2,618,398	1,605,948	1,636,428	(30,480)	658,246
392.20	Transportation Equipment - Light Trucks	7,280,300	4,309,735	4,371,796	(62,061)	2,495,615
392.30	Transportation Equipment - Trailers	3,359,668	829,173	848,586	(19,413)	229,567
392.40	Transportation Equipment - Heavy Trucks	5,246,997	3,173,919	3,199,852	(25,933)	2,568,408
393.00	Stores Equipment	349,039	282,260	285,567	(3,307)	172,296
394.00	Tools, Shop and Garage Equipment	7,354,785	4,231,798	4,285,710	(53,912)	2,439,078
395.00	Laboratory Equipment	228,526	78,051	80,398	(2,347)	0
396.00	Power Operated Equipment	2,392,301	1,515,541	1,523,778	(8,237)	1,773,769
397.00	Communication Equipment	73,787,628	24,330,864	24,614,828	(283,965)	14,888,262
398.00	Miscellaneous Equipment	964,017	879,815	885,718	(5,902)	683,541
		302,491,675	138,329,757	141,558,044	(3,228,286)	32,130,682

After Retirement of Fully Accrued Assets

	Plant Balance 12/31/2020	Allocated Reserve 12/31/2020	Amortization Life	Amortization Net Salvage %	Amortization Rate	Annual Amortization
391 Office Furniture and Equipment	27,998,991	12,789,158	20	0%	5.00%	1,399,950
391.2 Computer Hardware	164,689,127	78,081,595	6	0%	16.67%	27,448,188
392.1 Transportation Equipment - Automobiles	1,960,152	947,702	7	10%	12.86%	252,020
392.2 Transportation Equipment - Light Trucks	4,784,685	1,814,120	7	10%	12.86%	615,174
392.3 Transportation Equipment - Trailers	3,130,101	599,606	15	20%	5.33%	166,939
392.4 Transportation Equipment - Heavy Trucks	2,678,588	605,511	10	10%	9.00%	241,073
393 Stores Equipment	176,743	109,964	30	0%	3.33%	5,891
394 Tools, Shop and Garage Equipment	4,915,706	1,792,720	15	0%	6.67%	327,714
395 Laboratory Equipment	228,526	78,051	10	0%	10.00%	22,853
396 Power Operated Equipment	618,532	-258,227	10	30%	7.00%	43,297
397 Communication Equipment	58,899,366	9,442,602	15	0%	6.67%	3,926,624
398 Miscellaneous Equipment	280,476	196,274	20	0%	5.00%	14,024
General Plant Reserve Deficiency	See Note (1)					322,829
Total Common General Amortized	270,360,993	106,199,075				34,786,574

Note:
(1) 10 year amortization for general plant reserve deficiency proposed

Public Service of Colorado
Pro Forma Plant Accrual Rates

Plant or Unit	In Service Date	Retire Date	Total Life	ASL (1)	Interim Net Salvage %	Terminal Dismantling %	Composite Net Salvage %	Proposed Accrual Rate	
<u>PROFORMA SOLAR PRODUCTION</u>									
Arapahoe 5 CSG									
341 Structures and Improvements	2021	2046	25	21.49	0%	-9.26%	-9.26%	5.08%	
342 Fuel Holders, Producers, and Accessories	2021	2046	25	21.49	0%	-9.26%	-9.26%	5.08%	(2)
344 Generators	2021	2046	25	21.49	0%	-9.26%	-9.26%	5.08%	
345 Accessory Electric Equipment	2021	2046	25	21.49	0%	-9.26%	-9.26%	5.08%	
346 Miscellaneous Power Plant Equipment	2021	2046	25	21.49	0%	-9.26%	-9.26%	5.08%	
Valmont 9&10 CSG									
341 Structures and Improvements	2021	2046	25	22.07	0%	-8.53%	-8.53%	4.92%	
342 Fuel Holders, Producers, and Accessories	2021	2046	25	22.07	0%	-8.53%	-8.53%	4.92%	(2)
344 Generators	2021	2046	25	22.07	0%	-8.53%	-8.53%	4.92%	
345 Accessory Electric Equipment	2021	2046	25	22.07	0%	-8.53%	-8.53%	4.92%	
346 Miscellaneous Power Plant Equipment	2021	2046	25	22.07	0%	-8.53%	-8.53%	4.92%	
<u>PROFORMA OTHER PRODUCTION</u>									
Manchief									
341 Structures and Improvements	2022	2040	18	17.22	0.00%	-5.52%	-5.52%	6.13%	(2)
342 Fuel Holders, Producers, and Accessories	2022	2040	18	17.40	0.00%	-5.52%	-5.52%	6.06%	(2)
344 Generators	2022	2040	18	17.26	-0.84%	-5.52%	-6.36%	6.16%	
345 Accessory Electric Equipment	2022	2040	18	17.28	-0.81%	-5.52%	-6.33%	6.15%	
346 Miscellaneous Power Plant Equipment	2022	2040	18	17.05	0.00%	-5.52%	-5.52%	6.19%	(2)

Note:

(1) Average Service Life is impacted by account level interim retirement curves and terminal retirement date of each facility

(2) There is currently no anticipated balance in these accounts. In the event plant is added to these accounts, PSCo requests authorization to use the depreciation rate listed, which represents a whole life rate for this account.

APPENDIX B
Comparison of Approved vs Proposed Accrual Rates

Public Service of Colorado
Comparison of Approved vs Proposed
Depreciation Accrual Rates
At December 31, 2020

Plant or Unit	Account No.	Description	Plant Balance 12/31/2020 (1)	Approved Total Depr Rate (4) (2)	Notes	Depreciation Expense At Approved Rates (3)= (1) x (2)	Proposed Depreciation Rate (4)	Notes	Proposed Depreciation Expense (5)= (4) x (1)	Difference Accrual Rate (6)= (4)-(2)	Difference Amount (7)= (5)-(3)
ELECTRIC INTANGIBLE											
	301	Organization Costs	0	0.0000%		0	0.00%		0	0.00%	0
	302	Franchises and Consents.	17,129,579	(10)			(10)				
	303	Miscellaneous Intangible	12,615,042	(10)			(10)				
	303.03	Misc. Computer Software - 3 Year	0	33.3333%		0	33.33%		0	0.0000%	0
	303.07	Misc. Computer Software - 7 Year	74,885,913	14.2857%		10,697,977	14.29%		10,697,977	0.0000%	0
	303.10	Misc. Computer Software - 10 Year	67,176,579	10.0000%		6,717,658	10.00%		6,717,658	0.0000%	0
	303.15	Misc. Computer Software - 15 Year	0	6.6667%		0	6.67%		0	0.0000%	0
		Misc. Intangible Plant - Total/Composite	171,807,113	10.1367%		17,415,635	10.14%		17,415,635		0
		Total Electric Intangible	171,807,113	10.1367%		17,415,635	10.14%		17,415,635	0.00%	0
STEAM PRODUCTION											
Cameo	310.2	Land Rights	1,392	0.0000%		0	0.00%		0	0.0000%	0
Cherokee Unit 2 SC	314	Turbogenerator Units	1,822,036	6.2882%		114,573	5.59%		101,812	-0.7004%	(12,762)
Cherokee Unit 2 SC	315	Accessory Electric Equipment	2,060,951	4.2023%		86,607	4.93%		101,652	0.7300%	15,044
		Cherokee Unit 2 SC - Total/Composite	3,882,987	5.1811%		201,181	5.24%		203,464	0.0588%	2,283
Cherokee Unit 4	311	Structures and Improvements	11,176,565	5.5181%		616,734	4.92%		549,354	-0.6029%	(67,380)
Cherokee Unit 4	312	Boiler Plant Equipment	41,421,999	5.7528%		2,382,925	5.47%		2,265,051	-0.2846%	(117,874)
Cherokee Unit 4	312	Boiler Plant AQIR	2,094,832	6.0667%		139,656	6.17%		129,229	-0.4978%	(10,427)
Cherokee Unit 4	314	Turbogenerator Units	26,921,788	5.3198%		1,432,131	5.67%		1,498,225	0.2455%	66,093
Cherokee Unit 4	315	Accessory Electric Equipment	8,681,064	5.1262%		445,009	4.61%		399,789	-0.5209%	(45,220)
Cherokee Unit 4	315.2	Computers and Peripherals	3,233,582	6.1515%		198,914	11.11%	(3)	244,812	4.9596%	45,898
Cherokee Unit 4	316	Miscellaneous Equipment	548,747	8.1835%		44,907	8.35%		45,817	0.1660%	911
		Cherokee Unit 4 - Total/Composite	94,078,576	5.5914%		5,260,276	5.46%		5,132,277	-0.1361%	(127,998)
Cherokee Common	310.2	Land Rights	12,865,962	4.5863%		590,072	4.50%		578,868	-0.0871%	(11,203)
Cherokee Common	310.3	Water Rights	112,245	5.6505%		6,342	5.70%		6,402	0.0531%	60
Cherokee Common	311	Structures and Improvements	43,733,073	6.4425%		2,817,503	7.55%		3,301,242	1.1061%	483,739
Cherokee Common	312	Boiler Plant Equipment	10,756,698	6.5748%		707,231	8.35%		897,976	1.7733%	190,744
Cherokee Common	312	Boiler Plant AQIR	2,461,276	6.6667%		164,086	6.36%		156,516	-0.3076%	(7,570)
Cherokee Common	314	Turbogenerator Units	229,286	5.2816%		12,110	5.58%		12,794	0.2984%	684
Cherokee Common	315	Accessory Electric Equipment	9,369,122	5.1872%		485,995	5.25%		491,923	0.0633%	5,927
Cherokee Common	315.2	Computers and Peripherals	0	5.5587%		0	11.11%	(2)	0	5.5524%	0
Cherokee Common	316	Miscellaneous Equipment	1,654,248	7.3020%		120,793	6.49%		107,399	-0.8097%	(13,394)
		Cherokee Common - Total/Composite	81,181,909	6.0409%		4,904,133	6.84%		5,553,120	0.7994%	648,987
Coal Cars	312	Boiler Plant Equipment	20,020,245	4.7285%		946,657	4.56%		912,866	-0.1688%	(33,791)
Comanche Unit 1	311	Structures and Improvements	16,633,155	2.9734%		494,570	3.25%		539,905	0.2726%	45,335
Comanche Unit 1	312	Boiler Plant Equipment	216,416,165	3.8982%		8,436,335	4.16%		9,013,017	0.2665%	576,682
Comanche Unit 1	314	Turbogenerator Units	40,220,828	3.4614%		1,392,204	3.91%		1,573,243	0.4501%	181,039
Comanche Unit 1	315	Accessory Electric Equipment	20,471,436	3.0711%		628,698	3.66%		749,869	0.5919%	121,171
Comanche Unit 1	315.2	Computers and Peripherals	1,407,501	3.4460%		48,502	11.11%	(3)	156,389	7.6651%	107,886
Comanche Unit 1	316	Miscellaneous Equipment	914,298	2.7369%		25,023	5.57%		50,912	2.8315%	25,889
		Comanche Unit 1 - Total/Composite	296,063,384	3.7240%		11,025,333	4.08%		12,083,336	0.3574%	1,058,003
Comanche Unit 2	311	Structures and Improvements	8,413,195	2.5843%		217,422	3.12%		262,225	0.5325%	44,803
Comanche Unit 2	312	Boiler Plant Equipment	177,575,948	3.5390%		6,284,413	3.91%		6,945,945	0.3725%	661,532
Comanche Unit 2	314	Turbogenerator Units	40,368,504	3.0138%		1,216,626	4.16%		1,678,532	1.1442%	461,906
Comanche Unit 2	315	Accessory Electric Equipment	22,984,266	2.8577%		656,821	3.91%		899,381	1.0553%	242,559
Comanche Unit 2	315.2	Computers and Peripherals	0	3.3894%		0	11.11%	(2)	0	7.7417%	0
Comanche Unit 2	316	Miscellaneous Equipment	871,236	2.5649%		22,346	4.08%		35,532	1.5135%	13,186
		Comanche Unit 2 - Total/Composite	250,213,149	3.3562%		8,397,629	3.93%		9,821,614	0.5691%	1,423,986
Comanche Cm Retire with Unit 1 & 2	311	Structures and Improvements	1,505,849	2.0267%		30,519	5.36%		80,712	3.3332%	50,193
Comanche Cm Retire with Unit 1 & 2	312	Boiler Plant Equipment	14,842,287	2.2313%		331,176	7.39%		1,096,330	5.1552%	765,154
Comanche Cm Retire with Unit 1 & 2	314	Turbogenerator Units	2,133,205	2.2249%		47,462	7.15%		152,463	4.9222%	105,001
Comanche Cm Retire with Unit 1 & 2	315	Accessory Electric Equipment	1,643,329	1.9478%		32,009	9.15%		150,330	7.2001%	118,321
Comanche Cm Retire with Unit 1 & 2	315.2	Computers and Peripherals	190,989	2.1863%		4,176	11.11%	(3)	21,221	8.9248%	17,045
Comanche Cm Retire with Unit 1 & 2	316	Miscellaneous Equipment	661,437	2.2513%		14,891	12.06%		79,788	9.8116%	64,897
		Comanche Cm Retire with Unit 1 & 2 - Total/Composite	20,977,095	2.1940%		460,232	7.54%		1,580,843	5.3421%	1,120,611
Comanche Unit 3	310.2	Land Rights	8,159	1.7044%		139	1.63%		133	-0.0708%	(6)
Comanche Unit 3	311	Structures and Improvements	129,287,485	1.8055%		2,334,286	1.97%		2,541,337	0.1601%	207,051
Comanche Unit 3	312	Boiler Plant Equipment	544,630,626	1.9153%		10,431,310	2.44%		13,285,545	0.5241%	2,854,234
Comanche Unit 3	314	Turbogenerator Units	166,669,836	1.9262%		3,210,394	2.14%		3,568,800	0.2090%	348,406
Comanche Unit 3	315	Accessory Electric Equipment	90,629,149	1.7829%		1,615,827	1.94%		1,757,312	0.1561%	141,485
Comanche Unit 3	315.2	Computers and Peripherals	0	1.8926%		0	11.11%	(2)	0	9.2185%	0
Comanche Unit 3	316	Miscellaneous Equipment	19,398,331	2.0464%		396,967	2.32%		450,385	0.2754%	53,418
		Comanche Unit 3 - Total/Composite	950,623,587	1.8923%		17,988,924	2.27%		21,593,512	0.3792%	3,604,588

Public Service of Colorado
Comparison of Approved vs Proposed
Depreciation Accrual Rates
At December 31, 2020

Plant or Unit	Account No.	Description	Plant Balance 12/31/2020 (1)	Approved Total Depr Rate (4) (2)	Notes	Depreciation Expense At Approved Rates (3)= (1) x (2)	Proposed Depreciation Rate (4)	Notes	Proposed Depreciation Expense (5)= (4) x (1)	Difference Accrual Rate (6)= (4)-(2)	Difference Amount (7)= (5)-(3)
Comanche Cm Retire with Unit 3	311 Structures and Improvements		31,692,101	2.0267%		642,304	3.33%		1,056,576	1.3072%	414,273
Comanche Cm Retire with Unit 3	312 Boiler Plant Equipment		18,715,540	2.2313%		417,600	3.85%		721,114	1.6217%	303,514
Comanche Cm Retire with Unit 3	314 Turbogenerator Units		178,872	2.2249%		3,980	3.51%		6,282	1.2870%	2,302
Comanche Cm Retire with Unit 3	315 Accessory Electric Equipment		2,434,794	1.9478%		47,425	3.37%		82,048	1.4220%	34,623
Comanche Cm Retire with Unit 3	315.2 Computers and Peripherals		0	2.1863%		0	11.11%	(2)	0	8.9248%	0
Comanche Cm Retire with Unit 3	316 Miscellaneous Equipment		1,892,038	2.2513%		42,595	4.56%		86,342	2.3121%	43,747
Comanche Cm Retire with Unit 3 - Total/Composite			54,913,345	2.1013%		1,153,904	3.56%		1,952,362	1.4540%	798,458
Craig Unit 1	311 Structures and Improvements		6,681,129	5.1716%		345,521	4.64%		309,747	-0.5355%	(35,774)
Craig Unit 1	312 Boiler Plant Equipment		18,516,678	4.9996%		925,760	4.56%		844,292	-0.4400%	(81,468)
Craig Unit 1	314 Turbogenerator Units		2,342,209	10.9781%		257,130	9.88%		231,337	-1.1012%	(25,793)
Craig Unit 1	315 Accessory Electric Equipment		2,901,979	5.9522%		172,732	5.14%		149,234	-0.8097%	(23,498)
Craig Unit 1	315.2 Computers and Peripherals		0	5.5241%		0	11.11%	(2)	0	5.5870%	0
Craig Unit 1	316 Miscellaneous Equipment		122,465	4.7394%		5,804	3.88%		4,749	-0.8618%	(1,055)
Craig Unit 1 - Total/Composite			30,564,460	5.5847%		1,706,947	5.04%		1,539,359	-0.5483%	(167,588)
Craig Unit 2	311 Structures and Improvements		6,571,154	2.3957%		157,425	2.40%		157,504	0.0012%	79
Craig Unit 2	312 Boiler Plant Equipment		33,300,984	2.5146%		837,387	4.17%		1,388,310	1.6544%	550,923
Craig Unit 2	314 Turbogenerator Units		7,102,887	3.0040%		213,371	3.49%		247,553	0.4812%	34,182
Craig Unit 2	315 Accessory Electric Equipment		3,564,960	2.4474%		87,249	2.51%		89,351	0.0590%	2,102
Craig Unit 2	315.2 Computers and Peripherals		0	2.5855%		0	11.11%	(2)	0	8.5256%	0
Craig Unit 2	316 Miscellaneous Equipment		139,310	2.4521%		3,416	3.18%		4,436	0.7322%	1,020
Craig Unit 2 - Total/Composite			50,679,294	2.5629%		1,298,847	3.72%		1,887,154	1.1608%	588,307
Craig Common	311 Structures and Improvements		7,300,852	2.7072%		197,649	3.04%		221,756	0.3302%	24,107
Craig Common	312 Boiler Plant Equipment		23,740,228	3.6004%		854,743	3.83%		908,330	0.2257%	53,587
Craig Common	314 Turbogenerator Units		3,300,265	3.1493%		103,935	3.62%		119,536	0.4727%	15,600
Craig Common	315 Accessory Electric Equipment		2,111,220	2.6916%		56,826	3.14%		66,189	0.4435%	9,363
Craig Common	315.2 Computers and Peripherals		319,851	2.9146%		9,322	11.11%	(3)	22,006	8.1965%	12,684
Craig Common	316 Miscellaneous Equipment		2,006,357	3.4009%		68,234	4.49%		90,114	1.0905%	21,879
Craig Common - Total/Composite			38,778,773	3.3284%		1,290,709	3.68%		1,427,930	0.3539%	137,221
Hayden Unit 1	311 Structures and Improvements		6,751,016	2.8250%		190,716	2.78%		187,441	-0.0485%	(3,275)
Hayden Unit 1	312 Boiler Plant Equipment		122,772,414	4.8475%		5,951,393	6.17%		7,575,088	1.3225%	1,623,696
Hayden Unit 1	314 Turbogenerator Units		17,831,841	3.5009%		624,275	4.66%		831,640	1.1629%	207,365
Hayden Unit 1	315 Accessory Electric Equipment		5,142,587	3.0672%		157,733	3.48%		179,018	0.4139%	21,285
Hayden Unit 1	315.2 Computers and Peripherals		1,135,642	6.3914%		72,583	11.11%	(3)	126,182	4.7197%	53,599
Hayden Unit 1	316 Miscellaneous Equipment		257,721	2.8391%		7,317	5.08%		13,086	2.2386%	5,769
Hayden Unit 1 - Total/Composite			153,891,220	4.5513%		7,004,018	5.79%		8,912,456	1.2401%	1,908,438
Hayden Unit 2	311 Structures and Improvements		27,926,499	3.8168%		1,065,899	3.66%		1,021,369	-0.1595%	(44,530)
Hayden Unit 2	312 Boiler Plant Equipment		99,358,411	3.0083%		2,988,999	4.19%		4,164,541	1.1831%	1,175,542
Hayden Unit 2	314 Turbogenerator Units		15,131,935	2.8087%		425,011	3.46%		523,068	0.6480%	98,057
Hayden Unit 2	315 Accessory Electric Equipment		6,993,246	2.6379%		184,475	2.89%		202,226	0.2538%	17,751
Hayden Unit 2	315.2 Computers and Peripherals		975,875	4.9993%		48,787	11.11%	(3)	108,431	6.1118%	59,644
Hayden Unit 2	316 Miscellaneous Equipment		1,165,183	2.5002%		29,132	5.22%		60,855	2.7226%	31,723
Hayden Unit 2 - Total/Composite			151,551,148	3.1292%		4,742,302	4.01%		6,080,489	0.8830%	1,338,187
Hayden Common	311 Structures and Improvements		7,904,667	4.9803%		393,676	5.90%		466,104	0.9163%	72,428
Hayden Common	312 Boiler Plant Equipment		29,313,231	4.5606%		1,336,859	4.86%		1,424,224	0.2980%	87,365
Hayden Common	314 Turbogenerator Units		1,590,973	5.3967%		85,860	5.24%		83,334	-0.1588%	(2,526)
Hayden Common	315 Accessory Electric Equipment		299,321	4.5693%		13,677	5.26%		15,748	0.6918%	2,071
Hayden Common	315.2 Computers and Peripherals		0	4.7336%		0	11.11%	(2)	0	6.3775%	0
Hayden Common	316 Miscellaneous Equipment		1,970,611	6.1166%		120,534	6.48%		127,608	0.3590%	7,074
Hayden Common - Total/Composite			41,078,804	4.7485%		1,950,607	5.15%		2,117,017	0.4051%	166,411
Pawnee Unit 1	311 Structures and Improvements		141,874,484	2.2050%		3,128,332	2.21%		3,130,746	0.0017%	2,414
Pawnee Unit 1	312 Boiler Plant Equipment		567,806,245	3.0371%		17,244,843	3.77%		21,391,647	0.7303%	4,146,804
Pawnee Unit 1	314 Turbogenerator Units		75,873,783	2.4585%		1,865,357	3.18%		2,415,509	0.7251%	550,152
Pawnee Unit 1	315 Accessory Electric Equipment		61,689,230	2.2074%		1,361,728	2.41%		1,488,826	0.2060%	127,098
Pawnee Unit 1	315.2 Computers and Peripherals		8,163,408	3.2420%		264,658	11.11%	(3)	907,045	7.8691%	642,388
Pawnee Unit 1	316 Miscellaneous Equipment		6,182,794	2.3297%		144,041	2.94%		181,682	0.6088%	37,642
Pawnee Unit 1 - Total/Composite			861,589,944	2.7866%		24,008,959	3.43%		29,515,456	0.6391%	5,506,496

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Depreciation Accrual Rates
At December 31, 2020

Plant or Unit	Account No.	Description	Plant Balance 12/31/2020	Approved Total Depr Rate (4)	Notes	Depreciation Expense At Approved Rates	Proposed Depreciation Rate	Notes	Proposed Depreciation Expense	Difference Accrual Rate	Difference Amount
			(1)	(2)		(3)= (1) x (2)	(4)		(5)= (4) x (1)	(6)= (4)-(2)	(7)= (5)-(3)
Pawnee Common	311	Structures and Improvements	20,560,345	6.7754%		1,393,046	9.08%		1,866,784	2.3041%	473,738
Pawnee Common	312	Boiler Plant Equipment	25,954,446	6.9614%		1,806,793	8.14%		2,112,897	1.1794%	306,104
Pawnee Common	314	Turbogenerator Units	309,543	6.5777%		20,361	7.49%		23,199	0.9170%	2,838
Pawnee Common	315	Accessory Electric Equipment	938,730	5.9674%		56,018	2.90%		27,233	-3.0663%	(28,784)
Pawnee Common	315.2	Computers and Peripherals	465,779	6.8823%		32,056	11.11%	(3)	51,753	4.2288%	19,697
Pawnee Common	316	Miscellaneous Equipment	2,950,489	6.6594%		196,455	8.28%		244,438	1.6263%	47,983
Pawnee Common - Total/Composite			51,179,333	6.8479%		3,504,729	8.45%		4,326,305	1.6053%	821,576
Zuni Common	310.2	Land Rights	586,847	0.0000%		0	0.00%		0	0.0000%	0
Total Steam Production			3,151,855,493	3.0409%		95,845,385	3.64%		114,639,560	0.5963%	18,794,175
HYDRAULIC PRODUCTION											
Ames	331	Structures & Improvements	399,964	2.3793%		9,516	5.12%		20,466	2.7376%	10,949
Ames	332	Reservoirs, Dams & Waterways	9,790,217	3.0421%		297,828	4.74%		463,656	1.6938%	165,828
Ames	333	Waterwheels, Turbines & Generators	156,202	2.3055%		3,601	5.88%		9,185	3.5746%	5,584
Ames	334	Accessory Electric Equipment	1,760,800	2.9670%		52,243	5.10%		89,849	2.1357%	37,606
Ames	334.2	Accessory Electric Equipment	0	3.0074%		0	11.11%	(2)	0	8.1037%	0
Ames	335	Misc. Power Plant Equipment	102,063	2.6837%		2,739	4.71%		4,810	2.0288%	2,071
Ames	335.2	Recreational Facilities	168,012	2.8217%		4,741	4.65%		7,819	1.8323%	3,078
Ames	336	Roads, Railroads & Bridges	21,231	2.7612%		586	4.67%		991	1.9045%	404
Ames - Total/Composite			12,398,488	2.9944%		371,255	4.81%		596,774	1.8189%	225,519
Cabin Creek	331	Structures & Improvements	20,153,917	2.7279%		549,779	4.80%		968,234	2.0763%	148,455
Cabin Creek	332	Reservoirs, Dams & Waterways	21,375,865	2.5022%		534,867	5.40%		1,154,961	2.9009%	620,094
Cabin Creek	333	Waterwheels, Turbines & Generators	19,676,896	2.8618%		563,113	5.15%		1,012,948	2.2861%	449,834
Cabin Creek	334	Accessory Electric Equipment	4,738,508	2.9371%		139,175	5.61%		265,720	2.6706%	126,545
Cabin Creek	334.2	Computers & Peripherals	56,206	2.8036%		0	11.11%	(3)	0	8.3075%	0
Cabin Creek	335	Misc. Power Plant Equipment	696,051	2.6804%		18,657	4.85%		33,775	2.1719%	15,118
Cabin Creek	335.2	Recreational Facilities	3,927	2.9179%		115	4.51%		177	1.5958%	63
Cabin Creek	336	Roads, Railroads & Bridges	453,762	2.4036%		10,907	5.35%		24,294	2.9503%	13,387
Cabin Creek - Total/Composite			67,155,131	2.7051%		1,816,612	5.15%		3,460,108	2.4473%	1,643,496
Georgetown	331	Structures & Improvements	147,604	4.9606%		7,322	5.74%		8,478	0.7831%	1,156
Georgetown	332	Reservoirs, Dams & Waterways	20,294,802	5.1769%		1,050,642	7.04%		1,429,237	1.8655%	378,595
Georgetown	333	Waterwheels, Turbines & Generators	384,215	4.2262%		16,238	8.14%		31,268	3.9121%	15,031
Georgetown	334	Accessory Electric Equipment	522,378	5.1803%		27,061	6.57%		34,316	1.3890%	7,256
Georgetown	334.2	Computers & Peripherals	0	5.1616%		0	11.11%	(2)	0	5.9495%	0
Georgetown	335	Misc. Power Plant Equipment	1,317	4.5983%		61	5.79%		76	1.1915%	16
Georgetown	335.2	Recreational Facilities	240,335	5.1524%		12,383	5.97%		14,346	0.8167%	1,963
Georgetown	336	Roads, Railroads & Bridges	0	5.1616%		0	7.03%	(1)	0	1.8679%	0
Georgetown - Total/Composite			21,590,651	5.1583%		1,113,708	7.03%		1,517,722	1.8713%	404,016
Salida	331	Structures & Improvements	82,936	15.5793%		12,921	36.41%		30,199	20.8325%	17,278
Salida	332	Reservoirs, Dams & Waterways	2,704,463	17.9323%		484,973	38.64%		1,044,970	20.7064%	559,997
Salida	333	Waterwheels, Turbines & Generators	24,873	14.7550%		3,670	36.78%		9,149	22.0291%	5,479
Salida	334	Accessory Electric Equipment	273,607	15.5893%		42,653	36.66%		100,304	21.0706%	57,651
Salida	334.2	Computers & Peripherals	0	17.5215%		0	11.11%	(2)	0	-6.4115%	0
Salida	335	Misc. Power Plant Equipment	1,900	14.0135%		266	32.47%		617	18.4532%	351
Salida	335.2	Recreational Facilities	151,492	16.8030%		25,455	34.69%		52,551	17.8860%	27,096
Salida	336	Roads, Railroads & Bridges	20,450	15.0956%		3,087	36.02%		7,366	20.9219%	4,279
Salida - Total/Composite			3,259,721	17.5790%		573,025	38.20%		1,245,155	20.6192%	672,130
Shoshone	331	Structures & Improvements	4,215,418	2.2603%		95,281	2.52%		106,363	0.2629%	11,082
Shoshone	332	Reservoirs, Dams & Waterways	16,859,400	2.0428%		344,404	2.96%		489,104	0.8583%	144,700
Shoshone	333	Waterwheels, Turbines & Generators	3,668,464	2.1271%		78,032	2.93%		107,486	0.8029%	29,454
Shoshone	334	Accessory Electric Equipment	3,331,273	2.3660%		78,818	3.05%		101,581	0.6833%	22,763
Shoshone	334.2	Computers & Peripherals	0	2.1285%		0	11.11%	(2)	0	8.9826%	0
Shoshone	335	Misc. Power Plant Equipment	878,735	2.1746%		19,109	2.53%		22,228	0.3550%	3,119
Shoshone	335.2	Recreational Facilities	0	2.1285%		0	2.86%	(1)	0	0.7273%	0
Shoshone	336	Roads, Railroads & Bridges	9,247	1.6213%		150	3.77%		349	2.1528%	199
Shoshone - Total/Composite			28,962,536	2.1262%		615,794	2.86%		827,111	0.7296%	211,317
Tacoma	331	Structures & Improvements	310,681	3.0252%		9,399	3.84%		11,923	0.8125%	2,524
Tacoma	332	Reservoirs, Dams & Waterways	17,318,247	3.8517%		667,047	4.37%		756,472	0.5164%	89,425
Tacoma	333	Waterwheels, Turbines & Generators	1,214,415	3.4758%		42,211	4.21%		51,070	0.7295%	8,859
Tacoma	334	Accessory Electric Equipment	2,876,031	3.7017%		106,462	4.67%		134,335	0.9691%	27,873
Tacoma	334.2	Computers & Peripherals	0	3.7233%		0	11.11%	(2)	0	7.3878%	0
Tacoma	335	Misc. Power Plant Equipment	213,111	3.1796%		6,776	4.20%		8,948	1.0190%	2,172
Tacoma	335.2	Recreational Facilities	478,920	3.1806%		15,233	4.11%		19,695	0.9318%	4,463
Tacoma	336	Roads, Railroads & Bridges	270,175	2.8330%		7,654	4.31%		11,631	1.4722%	3,977
Tacoma - Total/Composite			22,681,580	3.7886%		854,781	4.38%		994,074	0.6141%	139,293
Total Hydraulic Production			156,048,107	3.4253%		5,345,172	5.54%		8,640,944	2.1120%	3,295,772

Public Service of Colorado
Comparison of Approved vs Proposed
Depreciation Accrual Rates
At December 31, 2020

Plant or Unit	Account No.	Description	Plant Balance 12/31/2020 (1)	Approved Total Depr Rate (4) (2)	Notes	Depreciation Expense At Approved Rates (3)= (1) x (2)	Proposed Depreciation Rate (4)	Notes	Proposed Depreciation Expense (5)= (4) x (1)	Difference Accrual Rate (6)= (4)-(2)	Difference Amount (7)= (5)-(3)
OTHER PRODUCTION											
Alamosa	341	Structures and Improvements	526,020	3.8389%		20,193	5.40%		28,400	1.5601%	8,206
Alamosa	342	Fuel Holders, Producers, and Accessories	331,421	1.5181%		5,031	2.42%		8,016	0.9004%	2,984
Alamosa	343	Prime Movers	0	2.6280%		0	4.10%	(1)	0	1.4767%	0
Alamosa	344	Generators	7,625,547	1.8092%		137,961	3.33%		253,644	1.5170%	115,682
Alamosa	345	Accessory Electric Equipment	994,564	7.2037%		71,645	8.29%		82,437	1.0850%	10,791
Alamosa	345.2	Computers and Peripherals	0	2.6280%		0	16.67%	(2)	0	14.0387%	0
Alamosa	346	Miscellaneous Power Plant Equipment	296,893	7.4631%		22,157	9.67%		28,714	2.2083%	6,556
Alamosa - Total/Composite			9,774,446	2.6292%		256,989	4.10%		401,210	1.4755%	144,221
Blue Spruce	341	Structures and Improvements	0	2.6031%		0	2.94%	(1)	0	0.3386%	0
Blue Spruce	342	Fuel Holders, Producers, and Accessories	0	2.6031%		0	2.94%	(1)	0	0.3386%	0
Blue Spruce	343	Prime Movers	0	2.6031%		0	2.94%	(1)	0	0.3386%	0
Blue Spruce	344	Generators	218,253,183	2.6025%		5,680,039	2.94%		6,418,267	0.3382%	738,228
Blue Spruce	345	Accessory Electric Equipment	923,556	2.8604%		26,417	3.16%		29,181	0.2992%	2,763
Blue Spruce	345.2	Computers and Peripherals	0	2.6031%		0	16.67%	(2)	0	14.0636%	0
Blue Spruce	346	Miscellaneous Power Plant Equipment	0	2.6031%		0	2.94%	(1)	0	0.3386%	0
Blue Spruce - Total/Composite			219,176,738	2.6036%		5,706,456	2.94%		6,447,448	0.3381%	740,991
Cherokee 5-7	341	Structures and Improvements	126,064,022	2.5358%		3,196,731	2.74%		3,447,944	0.1993%	251,212
Cherokee 5-7	342	Fuel Holders, Producers, and Accessories	5,680,939	2.7523%		156,356	2.63%		149,649	-0.1181%	(6,708)
Cherokee 5-7	343	Prime Movers	131,493,260	2.7453%		3,609,884	3.00%		3,941,055	0.2519%	331,171
Cherokee 5-7	344	Generators	244,245,248	2.6307%		6,425,360	2.94%		7,168,920	0.3044%	743,560
Cherokee 5-7	345	Accessory Electric Equipment	63,675,645	2.6200%		1,668,302	2.78%		1,757,029	0.1393%	88,727
Cherokee 5-7	345.2	Computers and Peripherals	0	2.6312%		0	16.67%	(2)	0	14.0355%	0
Cherokee 5-7	346	Miscellaneous Power Plant Equipment	27,526,672	2.5614%		705,068	3.68%		1,014,232	1.1231%	309,164
Cherokee 5-7 - Total/Composite			598,685,786	2.6327%		15,761,702	2.92%		17,478,828	0.2868%	1,717,125
Fruita	340	Land Rights	452	1.1052%		5	1.85%		8	0.7403%	3
Fruita	341	Structures and Improvements	92,014	1.5613%		1,437	3.01%		2,768	1.4473%	1,332
Fruita	342	Fuel Holders, Producers, and Accessories	599,152	3.0408%		18,219	5.28%		31,656	2.2427%	13,437
Fruita	343	Prime Movers	0	2.3778%		0	4.23%	(1)	0	1.8495%	0
Fruita	344	Generators	2,512,252	1.8005%		45,233	3.53%		88,779	1.7333%	43,546
Fruita	345	Accessory Electric Equipment	74,773	4.2196%		3,155	6.41%		4,793	2.1905%	1,638
Fruita	345.2	Computers and Peripherals	0	2.3778%		0	16.67%	(2)	0	14.2889%	0
Fruita	346	Miscellaneous Power Plant Equipment	200,385	7.7488%		15,527	9.51%		19,064	1.7647%	3,536
Fruita - Total/Composite			3,479,028	2.4023%		83,576	4.23%		147,069	1.8250%	63,493
Ft Saint Vrain Unit 1	341	Structures and Improvements	22,903,499	1.6188%		370,762	2.06%		471,396	0.4394%	100,634
Ft Saint Vrain Unit 1	342	Fuel Holders, Producers, and Accessories	3,664,793	2.1538%		78,932	2.57%		94,096	0.4138%	15,164
Ft Saint Vrain Unit 1	343	Prime Movers	4,065,900	3.3481%		136,130	4.77%		193,757	1.4173%	57,626
Ft Saint Vrain Unit 1	344	Generators	78,003,472	2.2035%		1,718,807	2.75%		2,141,580	0.5420%	422,773
Ft Saint Vrain Unit 1	345	Accessory Electric Equipment	21,305,835	2.0974%		446,869	2.86%		609,647	0.7640%	162,778
Ft Saint Vrain Unit 1	345.2	Computers and Peripherals	95,966	1.8621%		0	16.67%	(3)	0	14.8046%	0
Ft Saint Vrain Unit 1	346	Miscellaneous Power Plant Equipment	3,788,835	1.6657%		63,111	3.54%		134,195	1.8761%	71,084
Ft Saint Vrain Unit 1 - Total/Composite			133,828,301	2.1032%		2,814,610	2.72%		3,644,671	0.6202%	830,060
Ft Saint Vrain Unit 2	341	Structures and Improvements	30,833	3.7307%		1,150	4.34%		1,339	0.6116%	189
Ft Saint Vrain Unit 2	342	Fuel Holders, Producers, and Accessories	594,312	2.8630%		17,015	3.84%		22,797	0.9729%	5,782
Ft Saint Vrain Unit 2	343	Prime Movers	2,779,822	3.7520%		104,299	4.26%		118,328	0.5047%	14,029
Ft Saint Vrain Unit 2	344	Generators	86,584,175	2.5164%		2,178,804	3.09%		2,675,149	0.5733%	496,344
Ft Saint Vrain Unit 2	345	Accessory Electric Equipment	1,968,283	3.5782%		70,429	3.97%		78,073	0.3883%	7,644
Ft Saint Vrain Unit 2	345.2	Computers and Peripherals	1,818,121	2.5607%		46,557	16.67%	(3)	303,020	14.1060%	256,464
Ft Saint Vrain Unit 2	346	Miscellaneous Power Plant Equipment	538,315	3.3646%		18,112	4.62%		24,894	1.2598%	6,782
Ft Saint Vrain Unit 2 - Total/Composite			94,313,861	2.5833%		2,436,366	3.42%		3,223,599	0.8347%	787,232
Ft Saint Vrain Unit 3	341	Structures and Improvements	0	3.4230%		0	4.50%	(1)	0	1.0747%	0
Ft Saint Vrain Unit 3	342	Fuel Holders, Producers, and Accessories	659,565	3.7272%		24,583	4.16%		27,458	0.4359%	2,875
Ft Saint Vrain Unit 3	343	Prime Movers	4,759,486	3.9156%		186,362	4.26%		202,522	0.3395%	16,160
Ft Saint Vrain Unit 3	344	Generators	28,404,319	3.2332%		918,368	4.56%		1,294,665	1.3248%	376,296
Ft Saint Vrain Unit 3	345	Accessory Electric Equipment	633,752	3.7374%		23,686	3.92%		24,836	0.1815%	1,150
Ft Saint Vrain Unit 3	345.2	Computers and Peripherals	0	3.4230%		0	16.67%	(2)	0	13.2437%	0
Ft Saint Vrain Unit 3	346	Miscellaneous Power Plant Equipment	44,486	3.7636%		1,674	5.15%		2,292	1.3892%	618
Ft Saint Vrain Unit 3 - Total/Composite			34,501,608	3.3467%		1,154,674	4.50%		1,551,774	1.1510%	397,099
Ft Saint Vrain Unit 4	341	Structures and Improvements	3,062,941	1.6102%		49,319	2.14%		65,397	0.5249%	16,078
Ft Saint Vrain Unit 4	342	Fuel Holders, Producers, and Accessories	27,606,186	2.5550%		705,338	2.68%		739,538	0.1239%	34,200
Ft Saint Vrain Unit 4	343	Prime Movers	2,761,168	3.8916%		107,454	4.79%		132,374	0.9025%	24,921
Ft Saint Vrain Unit 4	344	Generators	93,927,607	2.5798%		2,423,144	3.52%		3,305,511	0.9394%	882,366
Ft Saint Vrain Unit 4	345	Accessory Electric Equipment	7,848,198	2.5161%		197,469	2.92%		228,860	0.4000%	31,391
Ft Saint Vrain Unit 4	345.2	Computers and Peripherals	0	2.5511%		0	16.67%	(2)	0	14.1156%	0
Ft Saint Vrain Unit 4	346	Miscellaneous Power Plant Equipment	17,384	2.4709%		430	3.66%		636	1.1849%	206
Ft Saint Vrain Unit 4 - Total/Composite			135,223,484	2.5758%		3,483,154	3.31%		4,472,315	0.7315%	989,162

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			(1)	(2)		(3)= (1) x (2)	(4)		(5)= (4) x (1)	(6)= (4)-(2)	(7)= (5)-(3)
Ft Saint Vrain Unit 5	341	Structures and Improvements	7,455,783	2.4774%		184,710	2.70%		201,255	0.2219%	16,546
Ft Saint Vrain Unit 5	342	Fuel Holders, Producers, and Accessories	2,200,775	2.6238%		57,744	2.60%		57,320	-0.0193%	(424)
Ft Saint Vrain Unit 5	343	Prime Movers	1,327,090	3.1567%		41,892	3.45%		45,726	0.2889%	3,833
Ft Saint Vrain Unit 5	344	Generators	59,827,684	2.5431%		1,521,478	2.87%		1,719,524	0.3310%	198,046
Ft Saint Vrain Unit 5	345	Accessory Electric Equipment	12,563,319	2.5365%		318,669	2.72%		341,276	0.1799%	22,607
Ft Saint Vrain Unit 5	345.2	Computers and Peripherals	0	2.5468%		0	16.67%	(2)	0	14.1199%	0
Ft Saint Vrain Unit 5	346	Miscellaneous Power Plant Equipment	644,763	2.5401%		16,378	3.65%		23,516	1.1071%	7,138
Ft Saint Vrain Unit 5 - Total/Composite			84,019,415	2.5481%		2,140,870	2.84%		2,388,616	0.2949%	247,746
Ft Saint Vrain Unit 6	341	Structures and Improvements	7,364,719	2.4782%		182,512	2.70%		198,762	0.2206%	16,250
Ft Saint Vrain Unit 6	342	Fuel Holders, Producers, and Accessories	2,477,944	2.6246%		65,036	2.60%		64,539	-0.0201%	(497)
Ft Saint Vrain Unit 6	343	Prime Movers	1,327,207	3.1578%		41,911	3.44%		45,687	0.2845%	3,776
Ft Saint Vrain Unit 6	344	Generators	62,860,470	2.5440%		1,599,170	2.90%		1,821,727	0.3540%	222,557
Ft Saint Vrain Unit 6	345	Accessory Electric Equipment	9,197,849	2.5376%		233,405	2.72%		250,409	0.1849%	17,004
Ft Saint Vrain Unit 6	345.2	Computers and Peripherals	0	2.5483%		0	16.67%	(2)	0	14.1184%	0
Ft Saint Vrain Unit 6	346	Miscellaneous Power Plant Equipment	631,726	2.4960%		15,768	3.63%		22,951	1.1371%	7,183
Ft Saint Vrain Unit 6 - Total/Composite			83,859,913	2.5493%		2,137,802	2.87%		2,404,075	0.3175%	266,273
Ft Saint Vrain Common	341	Structures and Improvements	13,330,432	2.0845%		277,873	2.98%		397,828	0.8999%	119,955
Ft Saint Vrain Common	342	Fuel Holders, Producers, and Accessories	1,911,610	2.3240%		44,426	2.78%		53,178	0.4579%	8,752
Ft Saint Vrain Common	343	Prime Movers	923,842	3.1735%		29,318	3.60%		33,272	0.4279%	3,954
Ft Saint Vrain Common	344	Generators	43,015,810	2.3105%		993,880	2.78%		1,196,642	0.4714%	202,762
Ft Saint Vrain Common	345	Accessory Electric Equipment	17,395,546	2.3240%		404,272	3.07%		534,365	0.7478%	130,093
Ft Saint Vrain Common	345.2	Computers and Peripherals	403,578	3.2462%		13,101	16.67%	(3)	67,263	13.4205%	54,162
Ft Saint Vrain Common	346	Miscellaneous Power Plant Equipment	1,753,887	3.0945%		54,274	4.49%		78,680	1.3916%	24,406
Ft Saint Vrain Unit 6 - Total/Composite			78,734,705	2.3079%		1,817,145	3.00%		2,361,228	0.6910%	544,083
Ft. Lupton CT	341	Structures and Improvements	191,963	2.3627%		4,535	3.94%		7,566	1.5786%	3,030
Ft. Lupton CT	342	Fuel Holders, Producers, and Accessories	350,190	2.8058%		9,826	4.19%		14,682	1.3868%	4,857
Ft. Lupton CT	343	Prime Movers	0	3.2085%		0	4.94%	(1)	0	1.7305%	0
Ft. Lupton CT	344	Generators	12,539,804	3.0846%		386,803	4.78%		599,545	1.6965%	212,742
Ft. Lupton CT	345	Accessory Electric Equipment	682,730	6.1215%		41,793	8.45%		57,697	2.3295%	15,904
Ft. Lupton CT	345.2	Computers and Peripherals	0	3.2085%		0	16.67%	(2)	0	13.4582%	0
Ft. Lupton CT	346	Miscellaneous Power Plant Equipment	4,773	1.4803%		71	12.26%		585	10.7823%	515
Ft. Lupton CT - Total/Composite			13,769,460	3.2175%		443,028	4.94%		680,076	1.7215%	237,048
Rocky Mountain	341	Structures and Improvements	8,956,582	2.7060%		242,365	3.23%		289,461	0.5258%	47,096
Rocky Mountain	342	Fuel Holders, Producers, and Accessories	2,279,742	3.1391%		71,563	3.18%		71,967	0.0177%	403
Rocky Mountain	343	Prime Movers	7,982,369	3.1315%		249,968	3.65%		291,411	0.5192%	41,443
Rocky Mountain	344	Generators	408,620,837	2.6522%		10,837,442	3.08%		12,604,755	0.4325%	1,767,314
Rocky Mountain	345	Accessory Electric Equipment	2,119,562	2.7567%		58,430	3.03%		64,209	0.2727%	5,779
Rocky Mountain	345.2	Computers and Peripherals	0	2.6587%		0	16.67%	(2)	0	14.0080%	0
Rocky Mountain	346	Miscellaneous Power Plant Equipment	774,543	2.6526%		20,546	4.13%		32,024	1.4820%	11,479
Rocky Mountain - Total/Composite			430,733,634	2.6653%		11,480,314	3.10%		13,353,828	0.4350%	1,873,514
Valmont 6	341	Structures and Improvements	15,622,333	1.4055%		219,572	5.08%		793,303	3.6725%	573,731
Valmont 6	342	Fuel Holders, Producers, and Accessories	1,161,386	1.7488%		20,310	3.32%		38,526	1.5684%	18,215
Valmont 6	343	Prime Movers	0	2.3349%		0	5.08%	(1)	0	2.7443%	0
Valmont 6	344	Generators	9,251,296	2.2941%		212,234	5.11%		473,099	2.8198%	260,866
Valmont 6	345	Accessory Electric Equipment	2,133,217	3.1096%		66,335	5.94%		126,804	2.8347%	60,470
Valmont 6	345.2	Computers and Peripherals	0	2.3349%		0	16.67%	(2)	0	14.3318%	0
Valmont 6	346	Miscellaneous Power Plant Equipment	82,117	3.0965%		2,543	3.84%		3,152	0.7413%	609
Valmont 6 - Total/Composite			28,250,349	1.8442%		520,993	5.08%		1,434,884	3.2350%	913,891
Valmont 7 & 8	341	Structures and Improvements	3,429,684	6.1070%	(7)	209,451	6.09%		208,799	-0.0190%	(651)
Valmont 7 & 8	342	Fuel Holders, Producers, and Accessories	1,347,748	6.1070%	(7)	82,307	5.99%		80,770	-0.1140%	(1,537)
Valmont 7 & 8	343	Prime Movers	0	6.1070%	(7)	0	6.12%	(1)	0	0.0095%	0
Valmont 7 & 8	344	Generators	6,923,940	6.1070%	(7)	422,845	6.28%		433,783	0.1580%	10,938
Valmont 7 & 8	345	Accessory Electric Equipment	7,940,596	6.1070%	(7)	484,932	6.02%		477,645	-0.0918%	(7,287)
Valmont 7 & 8	345.2	Computers and Peripherals	0	6.1070%	(7)	0	16.67%	(2)	0	10.5597%	0
Valmont 7 & 8	346	Miscellaneous Power Plant Equipment	162,661	6.1070%	(7)	9,934	6.37%		10,355	0.2589%	421
Valmont 7 & 8 - Total/Composite			19,804,631	6.1070%		1,209,469	6.12%		1,211,353	0.0095%	1,884
Wind to Hydrogen	344	Generators	1,017,482	5.2320%		53,235	5.23%		53,235	0.0000%	0
Total Other Production			1,969,172,841	2.6153%		51,500,383	3.11%		61,254,206	0.4953%	9,753,822

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WIND PRODUCTION											
Cheyenne Ridge WF	340	Land Rights	0	4.0000%	(6)	0	4.00%	(1)	0	0.0000%	0
Cheyenne Ridge WF	341	Structures and Improvements	26,510,642	4.3400%	(6)	1,150,562	4.11%		1,090,481	-0.2266%	(60,081)
Cheyenne Ridge WF	342	Fuel Holders, Producers, and Accessories	0	4.3400%	(6)	0	4.11%	(1)	0	-0.2266%	0
Cheyenne Ridge WF	344	Generators	589,177,653	4.3400%	(6)	25,570,310	4.11%		24,235,056	-0.2266%	(1,335,254)
Cheyenne Ridge WF	345	Accessory Electric Equipment	0	4.3400%	(6)	0	4.11%	(1)	0	-0.2266%	0
Cheyenne Ridge WF	346	Miscellaneous Power Plant Equipment	39,107,591	4.3400%	(6)	1,697,269	4.11%		1,608,648	-0.2266%	(88,621)
Cheyenne Ridge WF - Total/Composite			654,795,885	4.3400%		28,418,141	4.11%		26,934,185	-0.2266%	(1,483,957)
Rush Creek WF	340	Land Rights	0	4.0000%	(5)	0	4.00%	(1)	0	0.0000%	0
Rush Creek WF	341	Structures and Improvements	0	4.3400%	(5)	0	4.14%	(1)	0	-0.2007%	0
Rush Creek WF	342	Fuel Holders, Producers, and Accessories	0	4.3400%	(5)	0	4.14%	(1)	0	-0.2007%	0
Rush Creek WF	344	Generators	897,481,357	4.3400%	(5)	38,950,691	4.14%		37,148,974	-0.2008%	(1,801,717)
Rush Creek WF	345	Accessory Electric Equipment	18,379	4.3400%	(5)	798	4.38%		805	0.0400%	7
Rush Creek WF	346	Miscellaneous Power Plant Equipment	0	4.3400%	(5)	0	4.14%	(1)	0	-0.2007%	0
Rush Creek WF - Total/Composite			897,499,736	4.3400%		38,951,489	4.14%		37,149,779	-0.2007%	(1,801,710)
Total Wind Production			1,552,295,622	4.3400%		67,369,630	4.13%		64,083,964	-0.2117%	(3,285,666)
Total Production			6,829,372,062	3.2223%		220,060,571	3.64%		248,618,674	0.4182%	28,558,103
ELECTRIC TRANSMISSION											
350.2	Land Rights	96,124,140	0.9980%		959,319	1.02%			977,231	0.0186%	17,912
352	Structures and Improvements	140,331,126	1.1916%		1,672,186	1.86%			2,606,899	0.6661%	934,713
353	Station Equipment	1,254,947,887	1.9792%		24,837,929	2.10%			26,400,067	0.1245%	1,562,138
354	Towers and Fixtures	162,448,132	1.4750%		2,396,110	1.57%			2,548,060	0.0935%	151,950
355	Poles and Fixtures	713,704,510	2.2547%		16,091,896	2.61%			18,605,875	0.3522%	2,513,980
356	Overhead Conductors and Devices	395,884,944	1.7817%		7,053,482	1.76%			6,961,381	-0.0233%	(92,101)
357	Underground Conduit	47,278,487	1.6627%		786,099	1.65%			777,748	-0.0177%	(8,351)
358	Underground Conductors and Devices	72,023,257	1.9945%		1,436,504	2.16%			1,555,482	0.1652%	118,978
359	Roads and Trails	3,949,563	1.0825%		42,754	1.14%			44,966	0.0560%	2,212
Total Transmission			2,886,692,046	1.9149%		55,276,278	2.10%		60,477,708	0.1802%	5,201,430
ELECTRIC DISTRIBUTION											
360.2	Land Rights	48,034,185	0.9898%		475,442	1.07%			513,825	0.0799%	38,383
361	Structures and Improvements	100,313,565	1.5834%		1,588,365	1.77%			1,774,270	0.1853%	185,905
362	Station Equipment	743,061,487	1.8919%		14,057,980	2.14%			15,865,531	0.2433%	1,807,551
363	Energy Storage Equipment	0	0.0000%		0	10.00%	(2)		0	10.0000%	0
364	Poles, Towers and Fixtures	470,714,126	2.7020%		12,718,696	2.80%			13,179,407	0.0979%	460,712
365	Overhead Conductors and Devices	459,383,325	2.7400%		12,587,103	2.67%			12,278,757	-0.0671%	(308,346)
366	Underground Conduit	493,902,587	1.7497%		8,641,814	1.78%			8,770,386	0.0260%	128,572
367	Underground Conductors and Devices	2,029,768,356	2.1815%		44,279,397	2.15%			43,619,460	-0.0325%	(659,937)
368	Line Transformers	631,352,446	2.2600%		14,268,565	2.23%			14,108,264	-0.0254%	(160,302)
369	Services	23,234,652	2.1540%		500,474	2.43%			563,511	0.2713%	63,036
369.1	Services-Overhead	53,410,962	2.4347%		1,300,397	2.48%			1,326,094	0.0481%	25,697
369.2	Services-Underground	245,578,470	2.4311%		5,970,258	2.48%			6,085,104	0.0468%	114,846
370	Meters	164,096,208	3.8122%		6,255,676	4.12%			6,764,118	0.3098%	508,442
370.02	Meters - AGIS - AMI Equipment	8,551,008	3.8122%		325,982	5.00%			427,148	1.1831%	101,166
370.2	Meters-AMR	71,651,601	7.5908%		5,438,930	9.84%			7,053,073	2.2528%	1,614,144
371	Installation on Customer Premises	6,551,765	4.4155%		289,293	4.72%			309,355	0.3062%	20,061
371.4	Installations on Customer's Premises-EV	0	0.0000%		0	10.00%	(2)		0	10.0000%	0
373.00	Street Lighting and Signal Systems	179,254,398	2.9492%		5,286,571	4.44%			7,959,192	1.4910%	2,672,622
Total Distribution			5,728,859,142	2.3388%		133,984,942	2.45%		140,597,496	0.1154%	6,612,554

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<u>ELECTRIC GENERAL</u>											
	389.2	Land Rights	0	1.6667%		0	1.67%		0	0.0000%	0
	390	Structures and Improvements	11,906,292	2.2521%		268,142	2.50%		298,163	0.2522%	30,022
	391	Office Furniture and Equipment	7,383,571	4.5583%		336,565	5.00%		369,179	0.4417%	32,613
	391.2	Computer Hardware	27,086,580	16.2260%		4,395,068	16.67%		4,514,430	0.4407%	119,362
	392.1	Transportation Equipment-Autos	840,264	7.1923%		60,434	12.86%		108,034	5.6648%	47,600
	392.2	Transportation Equipment-Light Trucks	22,354,695	7.0136%		1,567,869	12.86%		2,874,175	5.8435%	1,306,306
	392.3	Transportation Equipment-Trailers	7,636,594	3.1247%		238,621	5.33%		407,285	2.2086%	168,664
	392.4	Transportation Equipment-Heavy Trucks	48,610,693	5.8937%		2,864,968	9.00%		4,374,962	3.1063%	1,509,994
	393	Stores Equipment	156,423	3.1640%		4,949	3.33%		5,214	0.1693%	265
	394	Tools, Shop and Garage Equipment	46,857,007	3.8445%		1,801,418	6.67%		3,123,800	2.8222%	1,322,383
	395	Laboratory Equipment	1,960,327	10.0000%		196,033	10.00%		196,033	0.0000%	0
	396	Power Operated Equipment	6,185,929	5.6340%		348,515	7.00%		433,015	1.3660%	84,500
	397	Communication Equipment	188,676,455	6.3007%		11,887,937	6.67%		12,578,430	0.3660%	690,493
	398	Miscellaneous Equipment	1,565,744	4.5977%		71,988	5.00%		78,287	0.4023%	6,299
		Retired Assets	41,334,017								
		Amortize reserve difference							1,494,972		1,494,972
		Total Electric General	412,554,590	6.4766%		24,042,508	7.48%		30,855,980	1.0026%	6,813,472
		Total Electric	16,029,284,953	2.8122%		450,779,933	3.11%		497,965,493	0.2944%	47,185,559
<u>COMMON INTANGIBLE</u>											
	301	Organization Costs	0	0.0000%		0			0	0.0000%	0
	302	Franchises and Consents	3,383,421	0.0000%		0	0.00%		0	0.0000%	0
	303	Misc Computer Software-3 Year	14,423,656	33.3333%		4,807,881	33.33%		4,807,881	0.0000%	0
	303.03	Misc Computer Software-7 Year	200,827,839	14.2857%		28,689,663	14.29%		28,689,663	0.0000%	0
	303.07	Misc Computer Software-10 Year	9,940,144	10.0000%		994,014	10.00%		994,014	0.0000%	0
	303.10	Misc Computer Software-15 Year	156,791,894	6.6667%		10,452,845	6.67%		10,452,845	0.0000%	0
		Total Common Intangible	385,366,955	11.6628%		44,944,403	11.66%		44,944,403	0.0000%	0
<u>COMMON GENERAL</u>											
	389.2	Land Rights	188,650,268	2.4191%		4,563,639	2.47%		4,655,269	0.0486%	91,630
	390	Structures and Improvements	2,200,824	(9)			(7)				
	390.07	Structures and Improvements - Leasehold Improvements	17,126,036	(8)			(6)				
	390.85	Structures and Improvements - 1800 Larimer	27,998,991	4.9019%		1,372,483	5.00%		1,399,950	0.0981%	27,467
	391	Office Furniture and Equipment	164,689,127	16.3559%		26,936,389	16.67%		27,448,188	0.3108%	511,799
	391.04	Computer Hardware	1,960,152	7.4233%		145,508	12.86%		252,020	5.4338%	106,512
	392.1	Transportation Equipment - Automobiles	4,784,685	7.3603%		352,167	12.86%		615,174	5.4968%	263,007
	392.2	Transportation Equipment - Light Trucks	3,130,101	3.1677%		99,152	5.33%		166,939	2.1656%	67,787
	392.4	Transportation Equipment - Heavy Trucks	2,678,588	6.1716%		165,312	9.00%		241,073	2.8284%	75,761
	393	Stores Equipment	176,743	3.1640%		5,592	3.33%		5,891	0.1693%	299
	394	Tools and Shop Equipment	4,915,706	3.9186%		192,627	6.67%		327,714	2.7481%	135,087
	395	Laboratory Equipment	228,526	9.9572%		22,755	10.00%		22,853	0.0428%	98
	396	Power Operated Equipment	618,532	5.8982%		36,482	7.00%		43,297	1.1018%	6,815
	397	Communication Equipment	58,899,366	5.4453%		3,207,247	6.67%		3,926,624	1.2214%	719,377
	398	Miscellaneous Equipment	280,476	4.6394%		13,012	5.00%		14,024	0.3606%	1,011
		Retired Assets	32,130,682								
		Amortize reserve difference							322,829		322,829
		Total Common General	510,468,803	7.7586%		37,112,365	7.73%		39,441,843	-0.0320%	2,329,478
		Total Common	895,835,758	9.5006%		82,056,768	9.42%		84,386,246	-0.0807%	2,329,478
		Total Electric and Common	16,925,120,711			532,836,701			582,351,739		49,515,038

Notes:

- (1) There is currently no balance in these accounts. In the event plant is added to these accounts, PSCo requests authorization to use the depreciation rate listed, which represents the composite depreciation rate for each unit.
- (2) There is currently no balance in this account. When plant is recorded to this account, PSCo requests authorization to use the depreciation rate listed, which represents the whole life rate.
- (3) There is a small balance in this account with a short remaining life or no remaining net book value. PSCo requests authorization to use the depreciation rate listed, which represents the whole life rate and cease accrual if there is no remaining net book value.
- (4) Approved Rates for Electric are from Docket No. 19AL-0268E and Common are from Docket No. 17AL-0363G, unless specified in the notes column.
- (5) Depreciation rates for Rush Creek were approved in Docket No. 16A-0117E.
- (6) Depreciation parameters for Cheyenne Ridge were approved in Docket 18A-905E.
- (7) Valmont 7 and 8 were purchased in May 2020 from Southwest Generation Operating Company, LLC. Life was approved in Docket No. 19A-0409E.
- (8) Amortized to the end of the lease term 6/2025.
- (9) Amortized over the lease term.
- (10) Amortized over the terms of the franchise agreements or license.

APPENDIX C
Comparison of Depreciation Parameters

Public Service of Colorado
Production Interim Retirement Parameters
At December 31, 2020

Account and Description	Approved (1)			Proposed			Difference		
	Curve	ASL	Net Salvage Percent	ASL	Curve	Net Salvage Percent	ASL	Curve	Net Salvage Percent
<u>STEAM PRODUCTION</u>									
310.2 Land Rights	NA	NA	0.00%	NA	NA	0.00%	NA	NA	0.00%
310.3 Water Rights	NA	NA	0.00%	NA	NA	0.00%	NA	NA	0.00%
311 Structures and Improvements	(2)		-20.00%	72	R4	-20.00%	NA	NA	0.00%
312 Boiler Plant Equipment	(2)		-15.00%	61	R0.5	-15.00%	NA	NA	0.00%
312 Boiler Plant Equipment AQIR	(2)		0.00%	61	R0.5	0.00%	NA	NA	0.00%
312 Coal Cars	(2)		0.00%	24	SQ	0.00%	NA	NA	0.00%
314 Turbogenerator Units	(2)		-15.00%	69	L1.5	-15.00%	NA	NA	0.00%
315 Accessory Electric Equipment	(2)		-10.00%	68	R3	-10.00%	NA	NA	0.00%
315.2 Computers and Peripherals	(2)		0.00%	9	R4	0.00%	NA	NA	0.00%
316 Miscellaneous Power Plant Equipment	(2)		-5.00%	50	R0.5	-5.00%	NA	NA	0.00%
<u>HYDRAULIC PRODUCTION</u>									
331 Structures and Improvements	(2)		-10.00%	70	R5	-10.00%	NA	NA	0.00%
332 Reservoirs, Dams and Waterways	(2)		-10.00%	64	R3	-10.00%	NA	NA	0.00%
333 Waterwheels, Turbines and Generators	(2)		-10.00%	58	L3	-10.00%	NA	NA	0.00%
334 Accessory Electric Equipment	(2)		-10.00%	50	R2	-10.00%	NA	NA	0.00%
334.2 Computers and Peripherals	(2)		0.00%	9	R4	0.00%	NA	NA	0.00%
335 Misc. Power Plant Equipment	(2)		-5.00%	64	S3	-5.00%	NA	NA	0.00%
335.2 Recreational Facilities	(2)		-5.00%	60	R2	-5.00%	NA	NA	0.00%
336 Roads, Railroads and Bridges	(2)		0.00%	60	R2	0.00%	NA	NA	0.00%
<u>OTHER PRODUCTION</u>									
340 Land Rights	NA	NA	0.00%			0.00%			
341 Structures and Improvements	(2)		-20.00%	70	R2	-20.00%	NA	NA	0.00%
342 Fuel Holders, Producers, and Accessories	(2)		-5.00%	60	R3	-5.00%	NA	NA	0.00%
343 Prime Movers	(2)		-10.00%	61	R0.5	-10.00%	NA	NA	0.00%
344 Generators	(2)		-10.00%	60	R1	-10.00%	NA	NA	0.00%
345 Accessory Electric Equipment	(2)		-10.00%	62	R1	-10.00%	NA	NA	0.00%
345.2 Computers and Peripherals	(2)		0.00%	6	R3	0.00%	NA	NA	0.00%
346 Miscellaneous Power Plant Equipment	(2)		-10.00%	30	R2	-10.00%	NA	NA	0.00%

**Public Service of Colorado
Production Interim Retirement Parameters
At December 31, 2020**

<u>Account and Description</u>	<u>Approved (1)</u>				<u>Proposed</u>			<u>Difference</u>		
	<u>Curve</u>	<u>ASL</u>	<u>Net Salvage Percent</u>		<u>ASL</u>	<u>Curve</u>	<u>Net Salvage Percent</u>	<u>ASL</u>	<u>Curve</u>	<u>Net Salvage Percent</u>
<u>WIND PRODUCTION</u>										
341 Structures and Improvements	NA	NA	0.0%	(3)	25	SQ	0.00%	NA	NA	0.00%
342 Fuel Holders, Producers, and Accessories	NA	NA	0.0%	(3)	25	SQ	0.00%	NA	NA	0.00%
343 Prime Movers	NA	NA	0.0%	(3)	25	SQ	0.00%	NA	NA	0.00%
344 Generators	NA	NA	0.0%	(3)	25	SQ	-10.00%	NA	NA	-10.00%
345 Accessory Electric Equipment	NA	NA	0.0%	(3)	25	SQ	-5.00%	NA	NA	-5.00%
346 Miscellaneous Power Plant Equipment	NA	NA	0.0%	(3)	25	SQ	0.00%	NA	NA	0.00%
<u>PROFORMA SOLAR PRODUCTION</u>										
341 Structures and Improvements	NA	NA	NA	(4)	25	R2	0.00%	NA	NA	N/A
342 Fuel Holders, Producers, and Accessories	NA	NA	NA	(4)	25	R2	0.00%	NA	NA	N/A
344 Generators	NA	NA	NA	(4)	25	R2	0.00%	NA	NA	N/A
345 Accessory Electric Equipment	NA	NA	NA	(4)	25	R2	0.00%	NA	NA	N/A
346 Miscellaneous Power Plant Equipment	NA	NA	NA	(4)	25	R2	0.00%	NA	NA	N/A
<u>PROFORMA OTHER PRODUCTION</u>										
341 Structures and Improvements	NA	NA	0.0%	(5)	70	R2	-20.00%	NA	NA	-20.00%
342 Fuel Holders, Producers, and Accessories	NA	NA	0.0%	(5)	60	R3	-5.00%	NA	NA	-5.00%
343 Prime Movers	NA	NA	0.0%	(5)	61	R0.5	-10.00%	NA	NA	-10.00%
344 Generators	NA	NA	0.0%	(5)	60	R1	-10.00%	NA	NA	-10.00%
345 Accessory Electric Equipment	NA	NA	0.0%	(5)	62	R1	-10.00%	NA	NA	-10.00%
345.2 Computers and Peripherals	NA	NA	0.0%	(5)	6	R3	0.00%	NA	NA	0.00%
346 Miscellaneous Power Plant Equipment	NA	NA	0.0%	(5)	30	R2	-10.00%	NA	NA	-10.00%

Note:

- (1) Approved interim retirement parameters for Electric are from Docket No. 19AL-0268E, unless specified in the notes column.
- (2) Used interim retirement ratio in last study. This study proposes interim retirement curves
- (3) No interim retirement parameters were requested for Rush Creek in Docket No. 16A-117E and for Cheyenne Ridge in Docket No. 18A-905E.
- (4) No interim retirement parameters were settled in the three-case settlement reached back in 2016 for the 2017-19 RES Plan.
- (5) No interim retirement parameters were requested in Docket No. 19A-409E for Manchief.

Public Service of Colorado
Comparison of Depreciation Parameters
At December 31, 2020

Account Number	Description	Notes	Approved (1)			Proposed			Difference	
			Curve	ASL	Net Salvage Percent	Curve	ASL	Net Salvage Percent	ASL	Net Salvage Percent
<u>ELECTRIC INTANGIBLE</u>										
301.00	Organization Costs									
302.00	Franchises and Consents	(2)								
303.00	Miscellaneous Intangible Plant	(2)	Various							
303.03	Misc. Computer Software - 3 Year		SQ	3	0%	SQ	3	0%	0	0%
303.07	Misc. Computer Software - 7 Year		SQ	7	0%	SQ	7	0%	0	0%
303.10	Misc. Computer Software - 10 Year		SQ	10	0%	SQ	10	0%	0	0%
303.15	Misc. Computer Software - 15 Year		SQ	15	0%	SQ	15	0%	0	0%
<u>COMMON INTANGIBLE</u>										
301.00	Organization Costs									
302.00	Franchises and Consents	(2)								
303.03	Miscellaneous Computer Software - 3 Year		SQ	3	0%	SQ	3	0%	0	0%
303.07	Misc. Computer Software - 7 Year		SQ	7	0%	SQ	7	0%	0	0%
303.10	Miscellaneous Computer Software - 10 Year		SQ	10	0%	SQ	10	0%	0	0%
303.15	Miscellaneous Computer Software - 15 Year		SQ	15	0%	SQ	15	0%	0	0%
<u>PRODUCTION</u>										
312.20	Coal Cars			24	0%	SQ	24	0%	0	0%
<u>TRANSMISSION</u>										
350.20	Land Rights		R5	100	0%	R5	100	0%	0	0%
352.00	Structures and Improvements		S2	88	-5%	S3	60	-10%	-28	-5%
353.00	Station Equipment		R2	58	-15%	R2	58	-20%	0	-5%
354.00	Towers and Fixtures		R4	81	-20%	R4	81	-20%	0	0%
355.00	Poles and Fixtures		R2.5	62	-40%	R2	62	-60%	0	-20%
356.00	OH Conductors and Devices		R2	70	-25%	R1.5	75	-30%	5	-5%
357.00	UG Conduit		R3	60	0%	R4	65	-5%	5	-5%
358.00	UG Conductors and Devices		R3	50	0%	R3	50	-5%	0	-5%
359.00	Roads and Trails		S5	92	0%	S5	92	0%	0	0%

Public Service of Colorado
Comparison of Depreciation Parameters
At December 31, 2020

Account Number	Description	Notes	Approved (1)			Proposed			Difference	
			Curve	ASL	Net Salvage Percent	Curve	ASL	Net Salvage Percent	ASL	Net Salvage Percent
<u>DISTRIBUTION</u>										
360.20	Land Rights		R4	100	0%	R4	100	0%	0	0%
361.00	Structures and Improvements		R2	65	-5%	R2.5	62	-10%	-3	-5%
362.00	Station Equipment		R1.5	57	-10%	R2	56	-20%	-1	-10%
363.00	Energy Storage Equipment		NA	NA	NA	SQ	10	0%	NA	NA
364.00	Poles, Towers and Fixtures		S0	54	-50%	R1	57	-60%	3	-10%
365.00	OH Conductors and Devices		R0.5	50	-40%	L0	56	-50%	6	-10%
366.00	UG Conduit		R3	70	-25%	S2	73	-30%	3	-5%
367.00	UG Conductors and Devices		R1.5	47	-5%	R1.5	51	-10%	4	-5%
368.00	Line Transformers		R1.5	47	-10%	R1.5	49	-10%	2	0%
369.00	Services		R5	50	-30%	R5	56	-40%	6	-10%
369.10	Services-Overhead		R5	50	-30%	R5	56	-40%	6	-10%
369.20	Services-Underground		R5	50	-30%	R5	56	-40%	6	-10%
370.00	Meters		R1.5	24	0%	R1.5	24	0%	0	0%
370.02	Meters - AGIS - AMI Equipment		NA	NA	NA	SQ	20	0%	NA	NA
370.20	Automated Meter Reading Equipment		S6	10	0%	S6	10	0%	0	0%
371.00	Installation on Customer Premises		L0.5	25	-20%	L0.5	25	-20%	0	0%
371.40	Installations on Customer's Premises-EV		NA	NA	NA	SQ	10	0%	NA	NA
373.00	Street Lighting and Signal Systems		R0.5	41	-25%	L0	28	-25%	-13	0%
<u>ELECTRIC GENERAL</u>										
389.20	Land Rights		R4	60	0%	R4	60	0%	0	0%
390.00	Structures and Improvements		R1.5	45	-5%	R1.5	45	-10%	0	-5%
391.00	Office Furniture and Equipment		SQ	20	0%	SQ	20	0%	0	0%
391.20	Computer Hardware		SQ	6	0%	SQ	6	0%	0	0%
392.10	Transportation Equipment - Automobiles		SQ	12	10%	SQ	7	10%	-5	0%
392.20	Transportation Equipment - Light Trucks		SQ	12	10%	SQ	7	10%	-5	0%
392.30	Transportation Equipment - Trailers		SQ	25	20%	SQ	15	20%	-10	0%
392.40	Transportation Equipment - Heavy Trucks		SQ	14	10%	SQ	10	10%	-4	0%
393.00	Stores Equipment		SQ	30	0%	SQ	30	0%	0	0%
394.00	Tools, Shop and Garage Equipment		SQ	25	0%	SQ	15	0%	-10	0%
395.00	Laboratory Equipment		SQ	10	0%	SQ	10	0%	0	0%
396.00	Power Operated Equipment		SQ	14	15%	SQ	10	30%	-4	15%
397.00	Communication Equipment		SQ	15	0%	SQ	15	0%	0	0%
398.00	Miscellaneous Equipment		SQ	20	0%	SQ	20	0%	0	0%

Public Service of Colorado
Comparison of Depreciation Parameters
At December 31, 2020

Account Number	Description	Notes	Approved (1)			Proposed			Difference	
			Curve	ASL	Net Salvage Percent	Curve	ASL	Net Salvage Percent	ASL	Net Salvage Percent
<u>COMMON GENERAL</u>										
389.20	Land Rights		R4	60	0%	R4	60	0%	0	0%
390.00	Structures and Improvements		R1.5	45	-10%	R1.5	45	-10%	0	0%
390.07	Structures and Improvements - Leasehold Improvem	(3)								
390.85	Structures and Improvements - 1800 Larimer	(4)								
391.00	Office Furniture and Equipment		SQ	20	0%	SQ	20	0%	0	0%
391.04	Computer Hardware		SQ	6	0%	SQ	6	0%	0	0%
392.10	Transportation Equipment - Automobiles		SQ	12	10%	SQ	7	10%	-5	0%
392.20	Transportation Equipment - Light Trucks		SQ	12	10%	SQ	7	10%	-5	0%
392.30	Transportation Equipment - Trailers		SQ	25	20%	SQ	15	20%	-10	0%
392.40	Transportation Equipment - Heavy Trucks		SQ	14	10%	SQ	10	10%	-4	0%
393.00	Stores Equipment		SQ	30	0%	SQ	30	0%	0	0%
394.00	Tools and Shop Equipment		SQ	25	0%	SQ	15	0%	-10	0%
395.00	Laboratory Equipment		SQ	10	0%	SQ	10	0%	0	0%
396.00	Power Operated Equipment		SQ	14	15%	SQ	10	30%	-4	15%
397.00	Communication Equipment		SQ	15	0%	SQ	15	0%	0	0%
398.00	Miscellaneous Equipment		SQ	20	0%	SQ	20	0%	0	0%

Notes:

- (1) Approved parameters for Electric are from Docket No. 19AL-0268E and Common are from Docket No. 17AL-0363G; unless specified in the Notes column.
(2) Amortized over the terms of the franchise agreements or license.
(3) Amortized over the lease term.
(4) Amortized to the end of the lease term 6/2025.

APPENDIX D
Retirement Data for all Generating Units

Public Service of Colorado
Terminal Retirement Dates
Electric Generation

Plant or Unit	Approved (1)				Proposed		Difference	
	Capacity	Install.	Retirement	Life	Retirement	Life		
	GMC MW (2)	Year	Year	Span	Year	Span		
<u>STEAM PRODUCTION</u>								
Cherokee Unit 2 Condenser	NA	2012		2027	15	2027	15	0
Cherokee Unit 4	335.0	1968		2027	59	2027	59	0
Comanche Unit 1	360.0	1973		2033	60	2033	60	0
Comanche Unit 2	365.0	1975		2035	60	2035	60	0
Comanche Unit 3	536.0	2010	(3)	2070	60	2070	60	0
Craig Unit 1	43.0	1980	(4)	2025	45	2025	45	0
Craig Unit 2	41.0	1979	(4)	2039	60	2039	60	0
Hayden Unit 1	149.0	1965		2030	65	2030	65	0
Hayden Unit 2	107.0	1976		2036	60	2036	60	0
Pawnee Unit 1 Gas	536.0	1981		2041	60	2041	60	0
<u>HYDRAULIC PRODUCTION</u>								
Ames	2.8	1906		2050	144	2050	144	0
Cabin Creek	324.0	1967		2054	87	2054	87	0
Georgetown	1.6	1939		2036	97	2036	97	0
Salida	0.6	1929		2027	98	2027	98	0
Shoshone	15.0	1908		2058	150	2058	150	0
Tacoma	4.5	1949		2050	101	2050	101	0
<u>OTHER PRODUCTION</u>								
Alamosa Unit 1	17.0	1973		2026	53	2026	53	0
Alamosa Unit 2	18.0	1973		2026	53	2026	53	0
Blue Spruce CT 1	146.0	2010		2050	40	(5) 2050	40	0
Blue Spruce CT 2	150.0	2010		2050	40	(5) 2050	40	0
Cherokee CT 5	182.0	2015		2055	40	2055	40	0
Cherokee CT 6	182.0	2015		2055	40	2055	40	0
Cherokee ST 7	248.0	2015		2055	40	2055	40	0
Fort St. Vrain ST 1	50.0	1996		2041	45	2041	45	0
Fort St. Vrain GT 2	50.0	1998		2041	43	2041	43	0
Fort St. Vrain GT 3	312.0	2001		2041	40	2041	40	0
Fort St. Vrain GT 4	138.0	2001		2041	40	2041	40	0
Fort St. Vrain GT 5	143.0	2009		2049	40	2049	40	0
Fort St. Vrain GT 6	143.0	2009		2049	40	2049	40	0
Fruita CT	162.0	1973		2026	53	2026	53	0
Ft. Lupton CT 1	162.0	1975		2026	51	2026	51	0
Ft. Lupton CT 2	18.0	1975		2026	51	2026	51	0
Rocky Mountain 1,2,3 CT 2x1	621.0	2010		2050	40	2050	40	0
Valmont CT 6	51.0	1973		2026	53	2026	53	0
Valmont CT 7	42.0	2020		2038	18	(6) 2038	18	0
Valmont CT 8	42.0	2020		2038	18	(6) 2038	18	0
Wind to Hydrogen	NA	2006		2021	15	2021	15	0

Public Service of Colorado
Terminal Retirement Dates
Electric Generation

Plant or Unit	Capacity GMC MW (2)	Install. Year	Approved (1)			Proposed			Difference	
			Retirement Year	Life Span		Retirement Year	Life Span			
<u>WIND PRODUCTION</u>										
Cheyenne Ridge Wind	498.4	2020	2045	25	(9)	2045	25		0	
Rush Creek Wind	600.0	2018	2043	25	(10)	2043	25		0	
<u>PROFORMA SOLAR PRODUCTION</u>										
Arapahoe 5 Community Solar Garden (CSG)	2.0	2021	NA	NA	(11)	2046	25	(7)	NA	
Valmont 9 & 10 Community Solar Garden (CSG)	4.0	2021	NA	NA	(11)	2046	25	(7)	NA	
<u>PROFORMA OTHER PRODUCTION</u>										
Manchief CT	301.0	2022	2040	18	(8)	2040	18	(8)	0	

- (1) Approved parameters for Electric are from Docket No. 19AL-0268E and Common are from Docket No. 17AL-0363G unless specified in the Notes column.
- (2) Gross Max Capacity in MW (GMC) rating is equal to the sum of the generator nameplate ratings for each site.
- (3) GMC represents Xcel's portion of ownership only. Total Plant GMC is 804 MW. Xcel Share of Comanche 3 is 66.67%.
- (4) GMC represents Xcel's portion of ownership only. Total Plant GMC is 876 MW. Xcel Share of Craig Units is 9.72%.
- (5) Blue Spruce and Rocky Mountain were acquired in December 2010. Blue Spruce was originally in-service in April 2003. Rocky Mountain was originally in-service in May 2004.
- (6) Valmont 7 and 8 were purchased in May 2020 from Southwest Generation Operating Company, LLC. Life was approved in Docket No. 19A-0409E.
- (7) Arapahoe and Valmont CSG will be in service in 2021. Life based on performance degradation warranty.
- (8) Manchief will be purchased in 2022 from Southwest Generation Operating Company, LLC. Life was approved in Docket No. 19A-0409E.
- (9) Life for Cheyenne Ridge was approved in Docket No. 18A-905E.
- (10) Life for Rush Creek was approved in Docket No. 16A-0117E.
- (11) No life was settled in the three-case settlement reached back in 2016 for the 2017-19 RES Plan.

APPENDIX E
Net Salvage Analysis by Account

**PSCO ELECTRIC
RETIREMENTS, GROSS SALVAGE, AND REMOVAL COST
AS ADJUSTED**

Transaction			Gross	Cost of	Net	Net	2-yr	3-yr	4-yr	5-yr	6-yr	7-yr	8-yr	9-yr	10-yr
Year	Description	Retirements	Salvage	Removal	Salvage	Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %
2004	311 Steam Prod Str & Improve	850,956	0	12,844	(12,844)	-1.51%									
2005	311 Steam Prod Str & Improve	3,681,731	34	575,146	(575,112)	-15.62%	-12.97%								
2006	311 Steam Prod Str & Improve	0	0	0	0	NA	-15.62%	-12.97%							
2007	311 Steam Prod Str & Improve	176,401	0	40,227	(40,227)	-22.80%	-22.80%	-15.95%	-13.34%						
2008	311 Steam Prod Str & Improve	0	0	0	0	NA	-22.80%	-22.80%	-15.95%	-13.34%					
2009	311 Steam Prod Str & Improve	247,213	0	41,212	(41,212)	-16.67%	-16.67%	-19.22%	-15.99%	-13.51%					
2010	311 Steam Prod Str & Improve	0	0	0	0	NA	-16.67%	-16.67%	-19.22%	-15.99%					
2011	311 Steam Prod Str & Improve	581,776	0	1,490,770	(1,490,770)	-256.24%	-256.24%	-184.80%	-184.80%	-156.38%	-156.38%	-45.81%	-39.01%		
2012	311 Steam Prod Str & Improve	1,411,629	4,957	576,403	(571,446)	-40.48%	-103.45%	-103.45%	-93.88%	-93.88%	-88.69%	-88.69%	-44.58%	-39.31%	
2013	311 Steam Prod Str & Improve	259,649	0	176,205	(176,205)	-67.86%	-44.74%	-99.35%	-99.35%	-91.18%	-91.18%	-86.67%	-86.67%	-45.53%	-39.31%
2014	311 Steam Prod Str & Improve	421,005	0	475,542	(475,542)	-112.95%	-95.75%	-98.46%	-101.49%	-101.49%	-94.31%	-94.31%	-90.24%	-45.53%	
2015	311 Steam Prod Str & Improve	2,358	0	36,848	(36,848)	-1562.35%	-121.03%	-100.82%	-60.16%	-102.78%	-102.78%	-95.50%	-95.50%	-91.36%	-90.24%
2016	311 Steam Prod Str & Improve	421,116	0	94,038	(94,038)	-22.33%	-30.91%	-71.81%	-70.88%	-53.82%	-91.84%	-91.84%	-86.29%	-86.29%	-91.36%
2017	311 Steam Prod Str & Improve	525,274	0	133,150	(133,150)	-25.35%	-24.01%	-27.83%	-53.99%	-56.20%	-48.91%	-82.20%	-82.20%	-78.02%	-86.29%
2018	311 Steam Prod Str & Improve	436,963	0	1,018,691	(1,018,691)	-233.13%	-119.70%	-90.06%	-92.57%	-97.32%	-93.62%	-72.05%	-98.45%	-78.02%	
2019	311 Steam Prod Str & Improve	20,001	0	23,737	(23,737)	-118.68%	-228.12%	-119.68%	-90.47%	-92.94%	-97.55%	-93.86%	-72.32%	-98.55%	-98.45%
2020	311 Steam Prod Str & Improve	484,422	0	4,361,788	(4,361,788)	-900.41%	-869.41%	-574.07%	-377.55%	-298.31%	-299.89%	-265.83%	-245.84%	-173.05%	-98.55%
2004	312 Steam Prod Boiler Plant Eq	1,266,727	(54)	47,933	(47,987)	-3.79%									
2005	312 Steam Prod Boiler Plant Eq	25,420,564	233	7,155,216	(7,154,983)	-28.15%	-26.99%								
2006	312 Steam Prod Boiler Plant Eq	0	88,076	(17,171)	105,247	NA	-27.73%	-26.60%							
2007	312 Steam Prod Boiler Plant Eq	5,907,286	102,466	843,541	(741,075)	-12.55%	-10.76%	-24.87%	-24.05%						
2008	312 Steam Prod Boiler Plant Eq	41,107	0	14,698	(14,698)	-35.76%	-12.71%	-10.94%		-24.88%					
2009	312 Steam Prod Boiler Plant Eq	1,916,291	100,000	1,479,522	(1,379,522)	-71.99%	-71.23%	-27.15%	-25.81%	-27.59%	-26.72%				
2010	312 Steam Prod Boiler Plant Eq	4,338,724	42,843	874,104	(831,261)	-19.16%	-35.34%	-35.35%	-24.31%	-23.45%	-26.62%	-25.88%			
2011	312 Steam Prod Boiler Plant Eq	18,215,465	802,437	5,936,216	(5,133,779)	-28.18%	-26.45%	-30.01%	-30.02%	-26.63%	-26.28%	-27.13%	-26.61%		
2012	312 Steam Prod Boiler Plant Eq	8,513,402	1,656	3,354,835	(3,353,178)	-39.39%	-31.75%	-29.99%	-32.43%	-32.44%	-29.42%	-29.15%	-28.75%	-28.27%	
2013	312 Steam Prod Boiler Plant Eq	4,046,063	68,044	1,315,421	(1,247,377)	-30.83%	-36.63%	-31.63%	-30.09%	-32.26%	-32.26%	-29.55%	-29.31%	-28.88%	-28.27%
2014	312 Steam Prod Boiler Plant Eq	2,686,042	0	357,117	(357,117)	-13.30%	-23.83%	-32.52%	-30.16%	-28.90%	-30.98%	-30.98%	-28.60%	-28.37%	-28.88%
2015	312 Steam Prod Boiler Plant Eq	28,810,363	496,936	9,265,407	(8,786,471)	-30.44%	-28.97%	-29.18%	-31.16%	-30.29%	-29.56%	-30.75%	-30.75%	-29.31%	-28.37%
2016	312 Steam Prod Boiler Plant Eq	8,529,642	0	1,198,343	(1,198,343)	-14.05%	-26.69%	-25.79%	-26.26%	-28.38%	-28.33%	-27.80%	-28.90%	-28.90%	-29.31%
2017	312 Steam Prod Boiler Plant Eq	22,335,973	124,728	6,126,152	(6,001,424)	-26.87%	-23.33%	-26.76%	-26.18%	-26.46%	-27.93%	-27.98%	-27.59%	-28.44%	-28.90%
2018	312 Steam Prod Boiler Plant Eq	15,063,540	82,500	1,248,213	(1,165,713)	-7.74%	-19.16%	-18.21%	-22.92%	-22.59%	-23.00%	-24.55%	-25.16%	-24.93%	-28.44%
2019	312 Steam Prod Boiler Plant Eq	1,080,769	8,632	325,382	(316,751)	-29.31%	-9.18%	-19.45%	-18.47%	-23.02%	-22.68%	-23.08%	-24.61%	-25.20%	-24.93%
2020	312 Steam Prod Boiler Plant Eq	5,796,348	6,012	1,352,666	(1,346,654)	-23.23%	-24.19%	-12.89%	-19.94%	-18.99%	-23.03%	-22.72%	-23.09%	-24.52%	-25.20%
2004	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA									
2005	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA								
2006	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA		NA					
2007	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA		NA					
2008	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA		NA	NA				
2009	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA		NA	NA	NA			
2010	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA		NA	NA	NA	NA		
2011	312.013 Steam Prod Blr Plt Eq-AQIR	925,730	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
2012	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
2013	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	32,221	(32,221)	NA	NA	-3.48%	-3.48%	-3.48%	-3.48%	-3.48%	-3.48%	-3.48%	0.00%
2014	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA	-3.48%	-3.48%	-3.48%	-3.48%	-3.48%	-3.48%	-3.48%
2015	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA	NA	-3.48%	-3.48%	-3.48%	-3.48%	-3.48%	-3.48%
2016	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA	NA	NA	-3.48%	-3.48%	-3.48%	-3.48%	-3.48%
2017	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA	NA	NA	NA	-3.48%	-3.48%	-3.48%	-3.48%
2018	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	-3.48%	-3.48%	-3.48%
2019	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	-3.48%	-3.48%
2020	312.013 Steam Prod Blr Plt Eq-AQIR	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	-3.48%

PSCO ELECTRIC
RETIREMENTS, GROSS SALVAGE, AND REMOVAL COST
AS ADJUSTED

Transaction Year	Description	Retirements	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
2004 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA									
2005 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	NA								
2006 312.061	Steam Prod Blr Plt-Coal Cr	15,898,384	0	0	0	0.00%	0.00%	0.00%							
2007 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	0.00%	0.00%	0.00%						
2008 312.061	Steam Prod Blr Plt-Coal Cr	822,764	720,112	0	720,112	87.52%	87.52%	4.31%	4.31%	4.31%					
2009 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	87.52%	87.52%	4.31%	4.31%	4.31%				
2010 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	NA	87.52%	87.52%	4.31%	4.31%	4.31%			
2011 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	NA	NA	87.52%	87.52%	4.31%	4.31%	4.31%		
2012 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	NA	NA	NA	87.52%	87.52%	4.31%	4.31%	4.31%	
2013 312.061	Steam Prod Blr Plt-Coal Cr	0	0	(153,049)	153,049	NA	NA	NA	NA	NA	106.13%	106.13%	5.22%	5.22%	4.31%
2014 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	NA	NA	NA	NA	NA	106.13%	106.13%	5.22%	5.22%
2015 312.061	Steam Prod Blr Plt-Coal Cr	164,553	0	0	0	0.00%	0.00%	93.01%	93.01%	93.01%	93.01%	93.01%	88.44%	88.44%	5.22%
2016 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	0.00%	0.00%	93.01%	93.01%	93.01%	93.01%	93.01%	88.44%	88.44%
2017 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	NA	0.00%	0.00%	93.01%	93.01%	93.01%	93.01%	93.01%	88.44%
2018 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	NA	NA	0.00%	0.00%	93.01%	93.01%	93.01%	93.01%	93.01%
2019 312.061	Steam Prod Blr Plt-Coal Cr	0	0	0	0	NA	NA	NA	NA	0.00%	0.00%	93.01%	93.01%	93.01%	93.01%
2020 312.061	Steam Prod Blr Plt-Coal Cr	220,865	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	39.71%	39.71%	93.01%
2004 314	Steam Prod Turbogen Units	86,752	0	0	0	0.00%									
2005 314	Steam Prod Turbogen Units	2,663,173	23	1,089,956	(1,089,932)	-40.93%	-39.63%								
2006 314	Steam Prod Turbogen Units	0	0	0	0	NA	-40.93%	-39.63%							
2007 314	Steam Prod Turbogen Units	436,428	0	247,591	(247,591)	-56.73%	-56.73%	-43.15%	-41.98%						
2008 314	Steam Prod Turbogen Units	0	0	0	0	NA	-56.73%	-56.73%	-43.15%	-41.98%					
2009 314	Steam Prod Turbogen Units	964,596	0	880,660	(880,660)	-91.30%	-91.30%	-80.53%	-80.53%	-54.58%	-53.44%				
2010 314	Steam Prod Turbogen Units	1,737,148	0	517,580	(517,580)	-29.79%	-51.75%	-51.75%	-52.45%	-52.45%	-47.16%	-46.46%			
2011 314	Steam Prod Turbogen Units	3,226,123	817,412	2,061,456	(1,244,044)	-38.56%	-35.49%	-44.57%	-44.57%	-45.41%	-45.41%	-44.09%	-43.67%		
2012 314	Steam Prod Turbogen Units	2,967,829	256,386	2,176,002	(1,919,616)	-64.68%	-51.08%	-46.42%	-51.28%	-51.28%	-51.54%	-51.54%	-49.18%	-48.83%	
2013 314	Steam Prod Turbogen Units	951,841	1,567	240,556	(238,989)	-25.11%	-55.07%	-47.62%	-44.13%	-48.75%	-48.75%	-49.09%	-49.09%	-47.41%	-48.83%
2014 314	Steam Prod Turbogen Units	2,463,864	0	584,884	(584,884)	-23.74%	-24.12%	-42.98%	-41.50%	-39.70%	-43.75%	-43.75%	-44.19%	-44.19%	-47.41%
2015 314	Steam Prod Turbogen Units	2,332,888	0	89,497	(89,497)	-3.84%	-14.06%	-15.89%	-32.50%	-34.14%	-33.59%	-37.39%	-37.39%	-37.95%	-44.19%
2016 314	Steam Prod Turbogen Units	48,011	0	356,049	(356,049)	-741.60%	-18.71%	-21.27%	-21.90%	-36.39%	-36.97%	-36.06%	-39.69%	-39.69%	-37.95%
2017 314	Steam Prod Turbogen Units	6,608,527	40,358	348,797	(308,439)	-4.67%	-9.98%	-8.39%	-11.69%	-12.72%	-22.75%	-25.49%	-25.86%	-28.82%	-39.69%
2018 314	Steam Prod Turbogen Units	628,848	0	231,025	(231,025)	-36.74%	-7.45%	-12.29%	-10.24%	-12.99%	-13.88%	-23.30%	-25.86%	-26.19%	-28.82%
2019 314	Steam Prod Turbogen Units	177,230	0	102,798	(102,798)	-58.00%	-41.41%	-8.66%	-13.38%	-11.11%	-13.64%	-14.47%	-23.68%	-26.15%	-26.19%
2020 314	Steam Prod Turbogen Units	1,216,351	0	559,817	(559,817)	-46.02%	-47.55%	-44.19%	-13.93%	-17.95%	-14.96%	-16.57%	-17.13%	-25.24%	-26.15%
2004 315	Steam Prod Acc Elec Eqp	56,619	0	18,862	(18,862)	-33.31%									
2005 315	Steam Prod Acc Elec Eqp	388,277	20	108,896	(108,876)	-28.04%	-28.71%								
2006 315	Steam Prod Acc Elec Eqp	0	0	0	0	NA	-28.04%	-28.71%							
2007 315	Steam Prod Acc Elec Eqp	0	0	2,532	(2,532)	NA	NA	-28.69%	-29.28%						
2008 315	Steam Prod Acc Elec Eqp	0	0	0	0	NA	NA	NA	-28.69%	-29.28%					
2009 315	Steam Prod Acc Elec Eqp	706,448	0	82,814	(82,814)	-11.72%	-11.72%	-12.08%	-12.08%	-17.74%	-18.51%				
2010 315	Steam Prod Acc Elec Eqp	88,397	0	0	0	0.00%	-10.42%	-10.42%	-10.74%	-10.74%	-16.42%	-17.19%			
2011 315	Steam Prod Acc Elec Eqp	346,298	48,750	219,712	(170,962)	-49.37%	-39.33%	-22.24%	-22.24%	-22.46%	-22.46%	-23.88%	-24.21%		
2012 315	Steam Prod Acc Elec Eqp	1,417,053	0	98,900	(98,900)	-6.98%	-15.30%	-14.57%	-13.79%	-13.79%	-13.89%	-13.89%	-15.75%	-16.08%	
2013 315	Steam Prod Acc Elec Eqp	100,154	0	8,299	(8,299)	-8.29%	-7.07%	-14.93%	-14.25%	-13.58%	-13.58%	-13.67%	-13.67%	-15.51%	-16.08%
2014 315	Steam Prod Acc Elec Eqp	775,564	17,097	105,068	(87,971)	-11.34%	-10.99%	-8.51%	-13.87%	-13.42%	-13.07%	-13.07%	-13.15%	-13.15%	-15.51%
2015 315	Steam Prod Acc Elec Eqp	182,085	0	254,970	(254,970)	-140.03%	-35.81%	-33.20%	-18.19%	-22.02%	-21.35%	-19.47%	-19.47%	-19.54%	-13.15%
2016 315	Steam Prod Acc Elec Eqp	174,555	0	30,957	(30,957)	-17.73%	-80.17%	-33.02%	-31.01%	-18.16%	-21.77%	-21.14%	-19.39%	-19.39%	-19.54%
2017 315	Steam Prod Acc Elec Eqp	777,667	26,184	174,967	(148,783)	-19.13%	-18.88%	-38.32%	-27.37%	-26.42%	-18.38%	-21.22%	-20.74%	-19.34%	-19.39%
2018 315	Steam Prod Acc Elec Eqp	277,582	0	37,339	(37,339)	-13.45%	-17.64%	-17.65%	-33.43%	-25.60%	-24.84%	-18.01%	-20.69%	-20.25%	-19.34%
2019 315	Steam Prod Acc Elec Eqp	154,058	0	10,163	(10,163)	-6.60%	-11.01%	-16.23%	-16.42%	-30.79%	-24.35%	-23.69%	-20.17%	-20.17%	-20.25%
2020 315	Steam Prod Acc Elec Eqp	293,354	0	13,633	(13,633)	-4.65%	-5.32%	-8.43%	-13.97%	-14.36%	-26.67%	-22.16%	-21.65%	-16.64%	-20.17%

PSCO ELECTRIC
RETIREMENTS, GROSS SALVAGE, AND REMOVAL COST
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Transaction Year	Description	Retirements	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
2004	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA									
2005	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA								
2006	315.004 Steam Prod Info Sys Comp	993,608	0	0	0	0.00%	0.00%	0.00%							
2007	315.004 Steam Prod Info Sys Comp	147,987	0	0	0	0.00%	0.00%	0.00%	0.00%						
2008	315.004 Steam Prod Info Sys Comp	50,351	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%					
2009	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	0.00%	0.00%	0.00%		0.00%				
2010	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%			
2011	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%		
2012	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	
2013	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%
2014	315.004 Steam Prod Info Sys Comp	0	0	15,918	(15,918)	NA	NA	NA	NA	NA	NA	-31.61%	-8.03%	-1.34%	0.00%
2015	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	-31.61%	-8.03%	-1.34%
2016	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	-31.61%	-8.03%
2017	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	-31.61%
2018	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2019	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2020	315.004 Steam Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2004	315.014 Steam Prod Boiler Controls	0	0	0	0	NA									
2005	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA								
2006	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA	NA							
2007	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA	NA	NA						
2008	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA	NA	NA	NA					
2009	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA	NA	NA	NA	NA				
2010	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA	NA	NA	NA	NA	NA			
2011	315.014 Steam Prod Boiler Controls	71,041	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
2012	315.014 Steam Prod Boiler Controls	0	0	13,464	(13,464)	NA	-18.95%	-18.95%	-18.95%	-18.95%	-18.95%	-18.95%	-18.95%	-18.95%	
2013	315.014 Steam Prod Boiler Controls	132,347	0	23,868	(23,868)	-18.03%	-28.21%	-18.36%	-18.36%	-18.36%	-18.36%	-18.36%	-18.36%	-18.36%	-18.95%
2014	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	-18.03%	-28.21%	-18.36%	-18.36%	-18.36%	-18.36%	-18.36%	-18.36%	-18.36%
2015	315.014 Steam Prod Boiler Controls	87,658	0	53,188	(53,188)	-60.68%	-60.68%	-35.02%	-41.14%	-31.10%	-31.10%	-31.10%	-31.10%	-31.10%	-18.36%
2016	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	-60.68%	-60.68%	-35.02%	-41.14%	-31.10%	-31.10%	-31.10%	-31.10%	-31.10%
2017	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA	-60.68%	-60.68%	-35.02%	-41.14%	-31.10%	-31.10%	-31.10%	-31.10%
2018	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA	NA	-60.68%	-60.68%	-35.02%	-41.14%	-31.10%	-31.10%	-31.10%
2019	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA	NA	NA	-60.68%	-60.68%	-35.02%	-41.14%	-31.10%	-31.10%
2020	315.014 Steam Prod Boiler Controls	0	0	0	0	NA	NA	NA	NA	NA	-60.68%	-60.68%	-35.02%	-41.14%	-31.10%
2004	316 Steam Prod Misc Pwr Pll Eq	0	(13)	0	(13)	NA									
2005	316 Steam Prod Misc Pwr Pll Eq	292,070	3,844	80,691	(76,846)	-26.31%	-26.32%								
2006	316 Steam Prod Misc Pwr Pll Eq	782,280	24,669	893	23,776	3.04%	-4.94%								
2007	316 Steam Prod Misc Pwr Pll Eq	1,237,284	0	0	0	0.00%	1.18%	-2.30%	-2.30%						
2008	316 Steam Prod Misc Pwr Pll Eq	0	(921)	0	(921)	NA	-0.07%	1.13%	-2.34%	-2.34%					
2009	316 Steam Prod Misc Pwr Pll Eq	0	0	0	0	NA	NA	-0.07%	1.13%	-2.34%	-2.34%				
2010	316 Steam Prod Misc Pwr Pll Eq	32,395	0	0	0	0.00%	0.00%	-2.84%	-0.07%	1.11%	-2.30%	-2.30%			
2011	316 Steam Prod Misc Pwr Pll Eq	58,918	0	54,660	(54,660)	-92.77%	-59.86%	-59.86%	-60.87%	-4.18%	-1.51%	-4.52%	-4.52%		
2012	316 Steam Prod Misc Pwr Pll Eq	953,473	22,666	11,827	10,839	1.14%	-4.33%	-4.19%	-4.19%	-4.28%	-1.96%	-0.68%	-2.91%	-2.91%	
2013	316 Steam Prod Misc Pwr Pll Eq	76,244	380	20,736	(20,356)	-26.70%	-0.92%	-5.90%	-5.72%	-5.72%	-5.81%	-2.76%	-1.32%	-3.44%	-2.91%
2014	316 Steam Prod Misc Pwr Pll Eq	46,705	50,070	70,094	(20,024)	-42.87%	-32.84%	-2.74%	-7.42%	-7.21%	-7.21%	-7.29%	-3.54%	-1.92%	-3.44%
2015	316 Steam Prod Misc Pwr Pll Eq	0	0	11,534	(11,534)	NA	-67.57%	-42.22%	-3.82%	-8.43%	-8.20%	-8.20%	-8.28%	-4.02%	-1.92%
2016	316 Steam Prod Misc Pwr Pll Eq	16,417	0	10,904	(10,904)	-66.42%	-136.68%	-67.27%	-45.07%	-4.76%	-9.26%	-9.01%	-9.01%	-9.08%	-4.02%
2017	316 Steam Prod Misc Pwr Pll Eq	149,049	0	120,264	(120,264)	-80.69%	-79.27%	-86.24%	-76.70%	-63.48%	-13.87%	-17.44%	-17.02%	-17.02%	-9.08%
2018	316 Steam Prod Misc Pwr Pll Eq	8	0	0	0	0.00%	-80.68%	-79.27%	-86.24%	-76.69%	-63.48%	-13.87%	-17.44%	-17.02%	-17.02%
2019	316 Steam Prod Misc Pwr Pll Eq	24,075	0	176	(176)	-0.73%	-0.73%	-69.57%	-69.29%	-75.38%	-68.95%	-58.64%	-13.62%	-17.14%	-17.02%
2020	316 Steam Prod Misc Pwr Pll Eq	795,912	0	132,648	(132,648)	-16.67%	-16.20%	-16.20%	-26.12%	-26.79%	-27.96%	-28.63%	-28.50%	-14.80%	-17.14%

**PSCO ELECTRIC
RETIREMENTS, GROSS SALVAGE, AND REMOVAL COST
AS ADJUSTED**

Transaction Year	Description	Retirements	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
2004	331 Hydro Prod Str & Improve	0	0	0	0	NA									
2005	331 Hydro Prod Str & Improve	123,386	0	0	0	0.00%	0.00%								
2006	331 Hydro Prod Str & Improve	0	0	0	0	NA	0.00%	0.00%							
2007	331 Hydro Prod Str & Improve	0	0	0	0	NA	NA	0.00%	0.00%						
2008	331 Hydro Prod Str & Improve	0	0	0	0	NA	NA	NA	0.00%	0.00%					
2009	331 Hydro Prod Str & Improve	9,651	0	4,019	(4,019)	-41.64%	-41.64%	-41.64%	-41.64%	-3.02%	-3.02%				
2010	331 Hydro Prod Str & Improve	8,275	0	0	0	0.00%	-22.42%	-22.42%	-22.42%	-22.42%	-2.84%	-2.84%			
2011	331 Hydro Prod Str & Improve	23,732	30,961	86,990	(56,029)	-236.09%	-175.05%	-144.14%	-144.14%	-144.14%	-144.14%	-144.14%	-36.38%	-36.38%	
2012	331 Hydro Prod Str & Improve	0	0	0	0	NA	-236.09%	-175.05%	-144.14%	-144.14%	-144.14%	-144.14%	-36.38%	-36.38%	-36.38%
2013	331 Hydro Prod Str & Improve	6,951	0	0	0	0.00%	0.00%	-182.60%	-143.82%	-123.53%	-123.53%	-123.53%	-123.53%	-34.91%	-36.38%
2014	331 Hydro Prod Str & Improve	6,911	0	16,642	(16,642)	-240.81%	-120.06%	-120.06%	-193.30%	-158.43%	-138.13%	-138.13%	-138.13%	-138.13%	-34.91%
2015	331 Hydro Prod Str & Improve	50,635	0	0	0	0.00%	-28.92%	-25.80%	-25.80%	-82.37%	-75.30%	-72.24%	-72.24%	-72.24%	-138.13%
2016	331 Hydro Prod Str & Improve	65,677	0	0	0	0.00%	0.00%	-13.51%	-12.78%	-12.78%	-47.22%	-44.81%	-44.63%	-44.63%	-72.24%
2017	331 Hydro Prod Str & Improve	80,765	0	0	0	0.00%	0.00%	0.00%	-8.16%	-7.89%	-7.89%	-30.97%	-29.91%	-30.36%	-44.63%
2018	331 Hydro Prod Str & Improve	76,465	0	59,224	(59,224)	-77.45%	-37.67%	-26.57%	-21.65%	-27.05%	-26.40%	-26.40%	-42.39%	-41.29%	-30.36%
2019	331 Hydro Prod Str & Improve	26,646	0	8,880	(8,880)	-33.32%	-66.05%	-37.04%	-27.29%	-22.69%	-27.60%	-26.98%	-26.98%	-41.68%	-41.29%
2020	331 Hydro Prod Str & Improve	5,548	0	23,180	(23,180)	-417.81%	-99.58%	-84.01%	-48.19%	-35.78%	-29.86%	-34.52%	-33.77%	-33.77%	-41.68%
2004	332 Hydro Prod Res, Dam & W Wy	0	0	0	0	NA									
2005	332 Hydro Prod Res, Dam & W Wy	527,963	0	265,059	(265,059)	-50.20%	-50.20%								
2006	332 Hydro Prod Res, Dam & W Wy	0	0	0	0	NA	-50.20%	-50.20%							
2007	332 Hydro Prod Res, Dam & W Wy	387,308	0	60,018	(60,018)	-15.50%	-15.50%	-35.52%	-35.52%						
2008	332 Hydro Prod Res, Dam & W Wy	0	0	0	0	NA	-15.50%	-15.50%	-35.52%	-35.52%					
2009	332 Hydro Prod Res, Dam & W Wy	54,335	389,115	606,953	(217,838)	-400.92%	-400.92%	-62.91%	-62.91%	-55.99%	-55.99%				
2010	332 Hydro Prod Res, Dam & W Wy	30,000	0	0	0	0.00%	-258.30%	-258.30%	-58.91%	-58.91%	-54.31%	-54.31%			
2011	332 Hydro Prod Res, Dam & W Wy	260,276	0	607,307	(607,307)	-233.33%	-209.22%	-239.44%	-239.44%	-120.94%	-120.94%	-91.30%	-91.30%		
2012	332 Hydro Prod Res, Dam & W Wy	0	0	0	0	NA	-233.33%	-209.22%	-239.44%	-239.44%	-120.94%	-120.94%	-91.30%	-91.30%	-91.30%
2013	332 Hydro Prod Res, Dam & W Wy	67,349	4,771	32,750	(27,979)	-41.54%	-41.54%	-193.91%	-177.64%	-207.09%	-207.09%	-114.25%	-114.25%	-88.77%	-91.30%
2014	332 Hydro Prod Res, Dam & W Wy	834,943	0	0	0	0.00%	-3.10%	-3.10%	-54.65%	-53.27%	-68.42%	-68.42%	-55.88%	-55.88%	-88.77%
2015	332 Hydro Prod Res, Dam & W Wy	313,614	0	106,074	(106,074)	-33.82%	-9.24%	-11.02%	-11.02%	-50.22%	-49.22%	-61.47%	-61.47%	-52.33%	-55.88%
2016	332 Hydro Prod Res, Dam & W Wy	1,225,193	0	1,550	(1,550)	-0.13%	-6.99%	-4.53%	-5.56%	-5.56%	-27.50%	-27.20%	-34.49%	-34.49%	-52.33%
2017	332 Hydro Prod Res, Dam & W Wy	0	0	0	(0)	NA	-0.13%	-6.99%	-4.53%	-5.56%	-27.50%	-27.20%	-34.49%	-34.49%	-34.49%
2018	332 Hydro Prod Res, Dam & W Wy	0	0	(3)	3	NA	NA	-0.13%	-6.99%	-4.53%	-5.55%	-27.50%	-27.20%	-34.49%	-34.49%
2019	332 Hydro Prod Res, Dam & W Wy	3,329	0	70,433	(70,433)	-2115.73%	-2115.65%	-2115.66%	-5.86%	-11.55%	-7.49%	-8.43%	-8.43%	-30.07%	-27.20%
2020	332 Hydro Prod Res, Dam & W Wy	72,377	0	30,194	(30,194)	-41.72%	-132.92%	-132.91%	-132.91%	-7.85%	-12.90%	-8.50%	-9.39%	-9.39%	-30.07%
2004	333 Hydro Prod Wat Whl, Tb & G	0	0	0	0	NA									
2005	333 Hydro Prod Wat Whl, Tb & G	239,506	0	85,359	(85,359)	-35.64%	-35.64%								
2006	333 Hydro Prod Wat Whl, Tb & G	0	0	0	0	NA	-35.64%	-35.64%							
2007	333 Hydro Prod Wat Whl, Tb & G	0	0	0	0	NA	NA	-35.64%	-35.64%						
2008	333 Hydro Prod Wat Whl, Tb & G	761,923	0	25,919	(25,919)	-3.40%	-3.40%	-3.40%	-11.11%	-11.11%					
2009	333 Hydro Prod Wat Whl, Tb & G	2,063	1,526	18,020	(16,494)	-799.57%	-5.55%	-5.55%	-5.55%	-12.73%	-12.73%				
2010	333 Hydro Prod Wat Whl, Tb & G	15,756	0	0	0	0.00%	-92.56%	-5.44%	-5.44%	-5.44%	-12.54%	-12.54%			
2011	333 Hydro Prod Wat Whl, Tb & G	24,143	3,096	6,899	(3,803)	-15.75%	-9.53%	-48.37%	-5.75%	-5.75%	-5.75%	-12.61%	-12.61%		
2012	333 Hydro Prod Wat Whl, Tb & G	0	0	0	0	NA	-15.75%	-9.53%	-48.37%	-5.75%	-5.75%	-5.75%	-12.61%	-12.61%	
2013	333 Hydro Prod Wat Whl, Tb & G	19,493	0	0	0	0.00%	0.00%	-8.72%	-6.40%	-33.03%	-5.61%	-5.61%	-5.61%	-12.38%	-12.61%
2014	333 Hydro Prod Wat Whl, Tb & G	6,383	0	1,636	(1,636)	-25.62%	-6.32%	-6.32%	-10.87%	-8.27%	-32.33%	-5.77%	-5.77%	-5.77%	-12.38%
2015	333 Hydro Prod Wat Whl, Tb & G	113,416	0	13,600	(13,600)	-11.99%	-12.72%	-10.94%	-10.94%	-11.65%	-10.62%	-19.60%	-6.52%	-6.52%	-5.77%
2016	333 Hydro Prod Wat Whl, Tb & G	315,790	0	0	0	0.00%	-3.17%	-3.50%	-3.35%	-3.35%	-3.97%	-3.85%	-7.15%	-4.88%	-6.52%
2017	333 Hydro Prod Wat Whl, Tb & G	30,991	0	821,487	(821,487)	-2650.72%	-236.89%	-181.46%	-179.33%	-172.14%	-172.14%	-164.74%	-159.80%	-162.30%	-4.88%
2018	333 Hydro Prod Wat Whl, Tb & G	0	0	0	0	NA	-2650.72%	-236.89%	-181.46%	-179.33%	-172.14%	-164.74%	-159.80%	-162.30%	-162.30%
2019	333 Hydro Prod Wat Whl, Tb & G	0	0	0	0	NA	NA	-2650.72%	-236.89%	-181.46%	-179.33%	-172.14%	-172.14%	-164.74%	-159.80%
2020	333 Hydro Prod Wat Whl, Tb & G	0	0	0	0	NA	NA	NA	-2650.72%	-236.89%	-181.46%	-179.33%	-172.14%	-172.14%	-164.74%

PSCO ELECTRIC
RETIREMENTS, GROSS SALVAGE, AND REMOVAL COST
AS ADJUSTED

Transaction Year	Description	Retirements	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
2004	334 Hydro Prod Access Elec Eqp	0	0	0	0	NA									
2005	334 Hydro Prod Access Elec Eqp	142,468	0	10,178	(10,178)	-7.14%	-7.14%								
2006	334 Hydro Prod Access Elec Eqp	0	0	0	0	NA	-7.14%	-7.14%							
2007	334 Hydro Prod Access Elec Eqp	0	0	0	0	NA	NA	NA	-7.14%						
2008	334 Hydro Prod Access Elec Eqp	0	0	0	0	NA	NA	NA	-7.14%	-7.14%					
2009	334 Hydro Prod Access Elec Eqp	9,535	0	3,626	(3,626)	-38.03%	-38.03%	-38.03%	-38.03%	-9.08%	-9.08%				
2010	334 Hydro Prod Access Elec Eqp	119,204	0	0	0	0.00%	-2.82%	-2.82%	-2.82%	-2.82%	-5.09%	-5.09%			
2011	334 Hydro Prod Access Elec Eqp	123,922	95,980	174,636	(78,656)	-63.47%	-32.35%	-32.57%	-32.57%	-32.57%	-32.57%	-23.40%	-23.40%		
2012	334 Hydro Prod Access Elec Eqp	189,646	11,664	17,747	(6,083)	-3.21%	-27.02%	-19.58%	-19.98%	-19.98%	-19.98%	-19.98%	-16.85%	-16.85%	
2013	334 Hydro Prod Access Elec Eqp	0	0	8,160	(8,160)	NA	-7.51%	-29.63%	-21.47%	-21.82%	-21.82%	-21.82%	-21.82%	-18.25%	-16.85%
2014	334 Hydro Prod Access Elec Eqp	30,344	0	5,835	(5,835)	-19.23%	-46.12%	-9.13%	-28.71%	-21.32%	-21.66%	-21.66%	-21.66%	-21.66%	-18.25%
2015	334 Hydro Prod Access Elec Eqp	13,160	0	4,800	(4,800)	-36.48%	-24.45%	-43.20%	-10.67%	-29.00%	-21.74%	-22.06%	-22.06%	-22.06%	-21.66%
2016	334 Hydro Prod Access Elec Eqp	262,276	0	30,287	(30,287)	-11.55%	-12.74%	-13.38%	-16.05%	-11.14%	-21.61%	-18.12%	-18.37%	-18.37%	-22.06%
2017	334 Hydro Prod Access Elec Eqp	90,065	0	2,430	(2,430)	-2.70%	-9.29%	-10.26%	-10.95%	-13.01%	-9.84%	-19.21%	-16.44%	-16.69%	-18.37%
2018	334 Hydro Prod Access Elec Eqp	0	0	0	0	NA	-2.70%	-9.29%	-10.26%	-10.95%	-13.01%	-9.84%	-19.21%	-16.44%	-16.69%
2019	334 Hydro Prod Access Elec Eqp	0	0	0	0	NA	NA	-2.70%	-9.29%	-10.26%	-10.95%	-13.01%	-9.84%	-19.21%	-16.44%
2020	334 Hydro Prod Access Elec Eqp	0	0	0	0	NA	NA	NA	-2.70%	-9.29%	-10.26%	-10.95%	-13.01%	-9.84%	-19.21%
2004	334.004 Hydro Access Elec Eqp	0	0	0	0	NA									
2005	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA								
2006	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA							
2007	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA						
2008	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA					
2009	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA				
2010	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA			
2011	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA		
2012	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	
2013	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2014	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2015	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2016	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2017	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2018	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2019	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2020	334.004 Hydro Access Elec Eqp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2004	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA									
2005	335 Hydro Prod Misc Pwr Plt Eq	19,829	0	0	0	0.00%	0.00%								
2006	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	0.00%	0.00%							
2007	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	0.00%	0.00%						
2008	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	NA	0.00%	0.00%					
2009	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	NA	NA	0.00%	0.00%				
2010	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	NA	NA	NA	0.00%	0.00%			
2011	335 Hydro Prod Misc Pwr Plt Eq	11,855	0	9,373	(9,373)	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-29.58%	-29.58%		
2012	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-29.58%	
2013	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-29.58%	-29.58%
2014	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	NA	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-29.58%
2015	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	NA	NA	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%	-79.06%
2016	335 Hydro Prod Misc Pwr Plt Eq	5,106	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	-55.26%	-55.26%	-55.26%	-55.26%	-79.06%
2017	335 Hydro Prod Misc Pwr Plt Eq	0	0	27	(27)	NA	-0.53%	-0.53%	-0.53%	-0.53%	-55.42%	-55.42%	-55.42%	-55.42%	
2018	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	-0.53%	-0.53%	-0.53%	-0.53%	-55.42%	-55.42%	-55.42%	-55.42%
2019	335 Hydro Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	NA	-0.53%	-0.53%	-0.53%	-55.42%	-55.42%	-55.42%	-55.42%
2020	335 Hydro Prod Misc Pwr Plt Eq	0	0	1,203	(1,203)	NA	NA	NA	NA	-24.08%	-24.08%	-24.08%	-24.08%	-24.08%	-55.42%

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AS ADJUSTED**

Transaction Year	Description	Retirements	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
2004	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA									
2005	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA								
2006	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA							
2007	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA						
2008	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA					
2009	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA				
2010	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA			
2011	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA		
2012	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	
2013	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2014	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2015	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2016	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2017	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2018	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2019	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2020	335.062 Hydro Prod Recreation Fac	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2004	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA									
2005	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA								
2006	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA							
2007	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA						
2008	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA					
2009	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA				
2010	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA			
2011	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA		
2012	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	
2013	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2014	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2015	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2016	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2017	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2018	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2019	336 Hydro Prod Road, RR & Brdg	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2020	336 Hydro Prod Road, RR & Brdg	24,862	0	342	(342)	-1.38%	-1.38%	-1.38%	-1.38%	-1.38%	-1.38%	-1.38%	-1.38%	-1.38%	NA
2004	341 Other Prod Str & Improve	0	0	0	0	NA									
2005	341 Other Prod Str & Improve	1,769	0	0	0	0.00%	0.00%								
2006	341 Other Prod Str & Improve	0	0	0	0	NA	0.00%	0.00%							
2007	341 Other Prod Str & Improve	0	0	0	0	NA	NA	0.00%	0.00%						
2008	341 Other Prod Str & Improve	0	0	0	0	NA	NA	NA	0.00%	0.00%					
2009	341 Other Prod Str & Improve	0	0	0	0	NA	NA	NA	NA	0.00%	0.00%				
2010	341 Other Prod Str & Improve	0	316	0	316	NA	NA	NA	NA	NA	17.85%	17.85%			
2011	341 Other Prod Str & Improve	53,663	0	13,047	(13,047)	-24.31%	-23.73%	-23.73%	-23.73%	-23.73%	-23.73%	-22.97%	-22.97%		
2012	341 Other Prod Str & Improve	5,724	0	303	(303)	-5.29%	-22.48%	-21.95%	-21.95%	-21.95%	-21.95%	-21.95%	-21.31%	-21.31%	
2013	341 Other Prod Str & Improve	78,121	0	14,636	(14,636)	-18.73%	-17.82%	-20.35%	-20.12%	-20.12%	-20.12%	-20.12%	-20.12%	-19.87%	-21.31%
2014	341 Other Prod Str & Improve	173,303	0	342,353	(342,353)	-197.55%	-141.99%	-138.94%	-119.15%	-119.05%	-119.05%	-119.05%	-119.05%	-119.05%	-19.87%
2015	341 Other Prod Str & Improve	34,635	0	31,405	(31,405)	-90.67%	-179.75%	-135.77%	-133.21%	-116.30%	-116.21%	-116.21%	-116.21%	-119.05%	
2016	341 Other Prod Str & Improve	849,112	32,367	490,237	(457,870)	-53.92%	-55.36%	-78.67%	-74.55%	-74.20%	-71.96%	-71.93%	-71.93%	-71.93%	-116.21%
2017	341 Other Prod Str & Improve	235,252	0	1,276,279	(1,276,279)	-542.52%	-159.92%	-157.78%	-163.11%	-154.88%	-154.26%	-149.38%	-149.36%	-149.36%	-71.93%
2018	341 Other Prod Str & Improve	316,443	0	2,689	(2,689)	-0.85%	-231.83%	-123.99%	-123.18%	-131.20%	-125.99%	-125.58%	-122.47%	-122.45%	-149.36%
2019	341 Other Prod Str & Improve	35,056	0	9,238	(9,238)	-26.35%	-3.39%	-219.55%	-121.60%	-120.88%	-128.96%	-123.57%	-120.58%	-122.45%	
2020	341 Other Prod Str & Improve	254,777	0	3,864	(3,864)	-1.52%	-4.52%	-2.60%	-153.54%	-103.51%	-103.25%	-111.86%	-108.18%	-107.88%	-120.58%

PSCO ELECTRIC
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AS ADJUSTED

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2004 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA									
2005 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA								
2006 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA							
2007 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA						
2008 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA	NA					
2009 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA	NA	NA				
2010 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA	NA	NA	NA			
2011 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA		
2012 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	
2013 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2014 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2015 341.045 Other Prod Str & Improve - Win		(0)	0	0	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2016 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2017 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2018 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2019 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2020 341.045 Other Prod Str & Improve - Win		0	0	0	0	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%
2004 342 Other Prod Fuel Hldr & Acc		0	0	0	0	NA									
2005 342 Other Prod Fuel Hldr & Acc	1,724,455	0	0	0	0	0.00%	0.00%								
2006 342 Other Prod Fuel Hldr & Acc	0	0	0	0	0	NA	0.00%	0.00%							
2007 342 Other Prod Fuel Hldr & Acc	0	0	0	0	0	NA	NA	0.00%	0.00%						
2008 342 Other Prod Fuel Hldr & Acc	0	0	0	0	0	NA	NA	NA	0.00%	0.00%					
2009 342 Other Prod Fuel Hldr & Acc	216,054	0	29,039	(29,039)	-13.44%	-13.44%	-13.44%	-13.44%	-1.50%	-1.50%					
2010 342 Other Prod Fuel Hldr & Acc	14,373	0	39,190	(39,190)	-272.66%	-29.61%	-29.61%	-29.61%	-29.61%	-3.49%	-3.49%				
2011 342 Other Prod Fuel Hldr & Acc	0	0	0	0	NA	-272.66%	-29.61%	-29.61%	-29.61%	-29.61%	-3.49%	-3.49%	-3.49%		
2012 342 Other Prod Fuel Hldr & Acc	21,272	0	13,429	(13,429)	-63.13%	-63.13%	-147.62%	-32.44%	-32.44%	-32.44%	-32.44%	-4.13%	-4.13%	-4.13%	
2013 342 Other Prod Fuel Hldr & Acc	284,431	0	79,023	(79,023)	-27.78%	-30.24%	-41.13%	-29.97%	-29.97%	-29.97%	-29.97%	-29.97%	-29.97%	-7.11%	-4.13%
2014 342 Other Prod Fuel Hldr & Acc	52,060	0	67,888	(67,888)	-130.40%	-43.66%	-44.82%	-44.82%	-53.62%	-38.86%	-38.86%	-38.86%	-38.86%	-38.86%	-7.11%
2015 342 Other Prod Fuel Hldr & Acc	194,996	0	61,016	(61,016)	-31.29%	-52.18%	-39.12%	-40.05%	-40.05%	-45.94%	-36.98%	-36.98%	-36.98%	-36.98%	-38.86%
2016 342 Other Prod Fuel Hldr & Acc	0	0	0	0	NA	-31.29%	-52.18%	-39.12%	-40.05%	-40.05%	-45.94%	-36.98%	-36.98%	-36.98%	-36.98%
2017 342 Other Prod Fuel Hldr & Acc	73,119	0	9,532	(9,532)	-13.04%	-13.04%	-26.31%	-43.24%	-35.97%	-36.89%	-36.89%	-42.18%	-34.93%	-34.93%	-36.98%
2018 342 Other Prod Fuel Hldr & Acc	104,093	0	71,591	(71,591)	-68.78%	-45.78%	-45.78%	-38.19%	-49.50%	-40.79%	-41.44%	-41.44%	-41.44%	-45.90%	-34.93%
2019 342 Other Prod Fuel Hldr & Acc	51,396	0	745	(745)	-1.45%	-46.52%	-35.81%	-35.81%	-33.73%	-44.31%	-38.13%	-38.13%	-38.13%	-38.81%	-45.90%
2020 342 Other Prod Fuel Hldr & Acc	260,696	15,542	696,248	(680,706)	-261.11%	-218.35%	-180.94%	-155.85%	-155.85%	-120.36%	-121.07%	-95.07%	-94.42%	-94.42%	-38.81%
2004 343 Other Prod Prime Movers	0	0	0	0	NA										
2005 343 Other Prod Prime Movers	5,500,635	0	103,600	(103,600)	-1.88%	-1.88%									
2006 343 Other Prod Prime Movers	0	0	0	0	NA	-1.88%	-1.88%								
2007 343 Other Prod Prime Movers	0	0	250	(250)	NA	NA	-1.89%	-1.89%							
2008 343 Other Prod Prime Movers	0	0	0	0	NA	NA	NA	-1.89%	-1.89%						
2009 343 Other Prod Prime Movers	223,282	0	0	0	0.00%	0.00%	-0.11%	-0.11%	-1.81%	-1.81%					
2010 343 Other Prod Prime Movers	0	0	0	0	NA	0.00%	0.00%	-0.11%	-0.11%	-1.81%	-1.81%				
2011 343 Other Prod Prime Movers	0	0	4,024	(4,024)	NA	NA	-1.80%	-1.80%	-1.91%	-1.91%			-1.88%		
2012 343 Other Prod Prime Movers	0	0	0	0	NA	NA	-1.80%	-1.80%	-1.91%	-1.91%			-1.88%	-1.88%	
2013 343 Other Prod Prime Movers	108,236	250,000	22,794	227,206	209.92%	209.92%	206.20%	206.20%	67.32%	67.32%	67.25%	67.25%	67.25%	2.05%	-1.88%
2014 343 Other Prod Prime Movers	807,745	0	1,014,064	(1,014,064)	-125.54%	-85.90%	-85.90%	-86.34%	-86.34%	-69.42%	-69.42%	-69.44%	-69.44%	-69.44%	2.05%
2015 343 Other Prod Prime Movers	0	0	185,076	(185,076)	NA	-148.46%	-106.11%	-106.11%	-106.55%	-106.55%	-85.67%	-85.67%	-85.67%	-85.69%	-69.44%
2016 343 Other Prod Prime Movers	0	0	0	0	NA	NA	-148.46%	-106.11%	-106.11%	-106.55%	-106.55%	-106.55%	-85.67%	-85.67%	-85.69%
2017 343 Other Prod Prime Movers	0	0	0	0	NA	NA	NA	-148.46%	-106.11%	-106.11%	-106.55%	-106.55%	-106.55%	-85.67%	-85.67%
2018 343 Other Prod Prime Movers	132,481	0	6,143	(6,143)	-4.64%	-4.64%	-4.64%	-144.34%	-128.19%	-93.29%	-93.29%	-93.29%	-93.29%	-93.67%	-85.67%
2019 343 Other Prod Prime Movers	47,640	0	3,363	(3,363)	-7.06%	-5.28%	-5.28%	-5.28%	-108.03%	-122.35%	-89.54%	-89.54%	-89.54%	-89.91%	-93.67%
2020 343 Other Prod Prime Movers	35,125	0	18,728	(18,728)	-53.32%	-26.69%	-13.12%	-13.12%	-13.12%	-99.10%	-119.98%	-88.41%	-88.41%	-88.41%	-89.91%

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2004 344 Other Prod Generators		0	0	0	0	NA									
2005 344 Other Prod Generators		5,167,147	1,149,988	666,317	483,671	9.36%	9.36%								
2006 344 Other Prod Generators		5,400,000	0	0	0	0.00%	4.58%	4.58%							
2007 344 Other Prod Generators		0	0	31	(31)	NA	0.00%	4.58%	4.58%						
2008 344 Other Prod Generators		0	0	0	0	NA	NA	0.00%	4.58%	4.58%					
2009 344 Other Prod Generators		2,031,650	0	115,255	(115,255)	-5.67%	-5.67%	-5.67%	-1.55%	2.92%	2.92%				
2010 344 Other Prod Generators		431,205	0	670,447	(670,447)	-155.48%	-31.90%	-31.90%	-31.90%	-9.99%	-2.32%	-2.32%			
2011 344 Other Prod Generators		2,506,356	0	412,647	(412,647)	-16.46%	-36.87%	-24.12%	-24.12%	-24.12%	-11.56%	-4.60%	-4.60%		
2012 344 Other Prod Generators		538,799	0	(361,601)	361,601	67.11%	-1.68%	-20.75%	-15.19%	-15.19%	-15.19%	-7.67%	-2.20%	-2.20%	
2013 344 Other Prod Generators		3,725,679	0	3,171,248	(3,171,248)	-85.12%	-65.88%	-47.59%	-54.05%	-43.41%	-43.41%	-43.41%	-27.39%	-17.80%	-2.20%
2014 344 Other Prod Generators		3,378,243	283,968	424,652	(140,685)	-4.16%	-46.62%	-38.60%	-33.14%	-38.12%	-32.89%	-32.89%	-32.89%	-23.03%	-17.80%
2015 344 Other Prod Generators		12,809,608	0	140,236	(140,236)	-1.09%	-1.74%	-17.34%	-15.11%	-15.26%	-17.84%	-16.87%	-16.87%	-16.87%	-23.03%
2016 344 Other Prod Generators		3,662,695	4,586	379,069	(374,483)	-10.22%	-3.12%	-3.30%	-16.23%	-14.37%	-14.57%	-16.81%	-16.03%	-16.03%	-16.87%
2017 344 Other Prod Generators		6,792,127	0	704,651	(704,651)	-10.37%	-10.32%	-5.24%	-5.10%	-14.92%	-13.49%	-13.71%	-15.52%	-14.96%	-16.03%
2018 344 Other Prod Generators		5,506,184	9,754	1,408,554	(1,398,800)	-25.40%	-17.10%	-15.52%	-9.10%	-8.58%	-16.53%	-15.29%	-15.37%	-16.90%	-14.96%
2019 344 Other Prod Generators		2,644,544	1,456,050	272,226	1,183,754	44.76%	-2.64%	-6.15%	-6.96%	-4.57%	-4.53%	-12.32%	-11.23%	-11.54%	-16.90%
2020 344 Other Prod Generators		20,596,139	290,000	677,169	(387,169)	-1.88%	3.43%	-2.09%	-3.68%	-4.29%	-3.50%	-3.54%	-8.68%	-8.00%	-11.54%
2004 344.045 Other Prod Generators-Wind		0	0	0	0	NA									
2005 344.045 Other Prod Generators-Wind		0	0	0	0	NA	NA								
2006 344.045 Other Prod Generators-Wind		0	0	0	0	NA	NA	NA							
2007 344.045 Other Prod Generators-Wind		0	0	0	0	NA	NA	NA	NA						
2008 344.045 Other Prod Generators-Wind		0	0	0	0	NA	NA	NA	NA	NA					
2009 344.045 Other Prod Generators-Wind		0	0	0	0	NA	NA	NA	NA	NA	NA				
2010 344.045 Other Prod Generators-Wind		0	0	(350)	350	NA	NA	NA	NA	NA	NA	NA			
2011 344.045 Other Prod Generators-Wind		940,872	0	149,456	(149,456)	-15.88%	-15.85%	-15.85%	-15.85%	-15.85%	-15.85%	-15.85%	-15.85%	-15.85%	
2012 344.045 Other Prod Generators-Wind		0	0	0	0	NA	-15.88%	-15.85%	-15.85%	-15.85%	-15.85%	-15.85%	-15.85%	-15.85%	
2013 344.045 Other Prod Generators-Wind		553,114	0	54,180	(54,180)	-9.80%	-9.80%	-13.63%	-13.61%	-13.61%	-13.61%	-13.61%	-13.61%	-13.61%	-15.85%
2014 344.045 Other Prod Generators-Wind		474,246	0	47,413	(47,413)	-10.00%	-9.89%	-9.89%	-12.76%	-12.74%	-12.74%	-12.74%	-12.74%	-12.74%	-13.61%
2015 344.045 Other Prod Generators-Wind		0	0	0	0	NA	-10.00%	-9.89%	-9.89%	-12.76%	-12.74%	-12.74%	-12.74%	-12.74%	-12.74%
2016 344.045 Other Prod Generators-Wind		0	0	0	0	NA	NA	-10.00%	-9.89%	-9.89%	-12.76%	-12.74%	-12.74%	-12.74%	-12.74%
2017 344.045 Other Prod Generators-Wind		0	0	0	0	NA	NA	NA	-10.00%	-9.89%	-9.89%	-12.76%	-12.74%	-12.74%	-12.74%
2018 344.045 Other Prod Generators-Wind		0	0	0	0	NA	NA	NA	NA	-10.00%	-9.89%	-9.89%	-12.76%	-12.74%	-12.74%
2019 344.045 Other Prod Generators-Wind		0	0	0	0	NA	NA	NA	NA	NA	-10.00%	-9.89%	-9.89%	-12.76%	-12.74%
2020 344.045 Other Prod Generators-Wind		0	6,765	0	6,765	NA	NA	NA	NA	NA	NA	-8.57%	-9.23%	-9.23%	-12.76%
2004 345 Other Prod Access Elec Eqp		0	0	0	0	NA									
2005 345 Other Prod Access Elec Eqp		353,889	0	15,038	(15,038)	-4.25%	-4.25%								
2006 345 Other Prod Access Elec Eqp		0	0	0	0	NA	-4.25%	-4.25%							
2007 345 Other Prod Access Elec Eqp		1,873	0	2,610	(2,610)	-139.33%	-139.33%	-4.96%	-4.96%						
2008 345 Other Prod Access Elec Eqp		0	0	0	0	NA	-139.33%	-139.33%	-4.96%	-4.96%					
2009 345 Other Prod Access Elec Eqp		575,138	0	19,061	(19,061)	-3.31%	-3.31%	-3.76%	-3.76%	-3.94%	-3.94%				
2010 345 Other Prod Access Elec Eqp		0	0	0	0	NA	-3.31%	-3.31%	-3.76%	-3.76%	-3.94%	-3.94%			
2011 345 Other Prod Access Elec Eqp		837,069	0	255,674	(255,674)	-30.54%	-30.54%	-19.45%	-19.45%	-19.61%	-19.61%	-16.54%	-16.54%		
2012 345 Other Prod Access Elec Eqp		310,449	0	33,332	(33,332)	-10.74%	-25.19%	-25.19%	-17.88%	-17.88%	-18.02%	-18.02%	-15.67%	-15.67%	
2013 345 Other Prod Access Elec Eqp		288,876	219,468	155,360	64,107	22.19%	5.14%	-15.66%	-15.66%	-12.13%	-12.13%	-12.25%	-12.25%	-11.05%	-15.67%
2014 345 Other Prod Access Elec Eqp		15,074	0	15,927	(15,927)	-105.65%	15.85%	2.42%	-16.59%	-16.59%	-12.82%	-12.82%	-12.94%	-12.94%	-11.05%
2015 345 Other Prod Access Elec Eqp		274,282	11,304	21,759	(10,455)	-3.81%	-9.12%	6.52%	0.49%	-14.56%	-14.56%	-11.75%	-11.75%	-11.85%	-12.94%
2016 345 Other Prod Access Elec Eqp		469,849	0	34,946	(34,946)	-7.44%	-6.10%	-8.08%	0.27%	-2.25%	-13.04%	-13.04%	-11.02%	-11.02%	-11.85%
2017 345 Other Prod Access Elec Eqp		1,224,497	0	119,018	(119,018)	-9.72%	-9.09%	-8.35%	-9.09%	-5.11%	-5.79%	-11.85%	-11.85%	-10.62%	-11.02%
2018 345 Other Prod Access Elec Eqp		84,698	0	53,714	(53,714)	-63.42%	-13.19%	-11.67%	-10.62%	-11.32%	-7.21%	-7.62%	-13.10%	-13.10%	-10.62%
2019 345 Other Prod Access Elec Eqp		11,589	0	1,530	(1,530)	-13.21%	-57.37%	-13.19%	-11.68%	-10.64%	-11.33%	-7.24%	-7.64%	-13.10%	-13.10%
2020 345 Other Prod Access Elec Eqp		442,627	0	120,318	(120,318)	-27.18%	-26.83%	-32.58%	-16.71%	-14.76%	-13.56%	-14.11%	-10.38%	-10.41%	-13.10%

**PSCO ELECTRIC
RETIREMENTS, GROSS SALVAGE, AND REMOVAL COST
AS ADJUSTED**

Transaction Year	Description	Retirements	Gross Salvage	Cost of Removal	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
2004	345.004 Other Prod Info Sys Comp	0	0	0	0	NA									
2005	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA								
2006	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	NA							
2007	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA						
2008	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA					
2009	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA				
2010	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA			
2011	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA		
2012	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	
2013	345.004 Other Prod Info Sys Comp	197,107	0	10,065	(10,065)	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	NA
2014	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%
2015	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%	-5.11%
2016	345.004 Other Prod Info Sys Comp	357,744	0	51,120	(51,120)	-14.29%	-14.29%	-14.29%	-11.03%	-11.03%	-11.03%	-11.03%	-11.03%	-11.03%	-5.11%
2017	345.004 Other Prod Info Sys Comp	778,927	0	17,298	(17,298)	-2.22%	-6.02%	-6.02%	-6.02%	-5.88%	-5.88%	-5.88%	-5.88%	-5.88%	-11.03%
2018	345.004 Other Prod Info Sys Comp	0	0	856	(856)	NA	-2.33%	-6.09%	-6.09%	-6.09%	-5.95%	-5.95%	-5.95%	-5.95%	-5.88%
2019	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	-2.33%	-6.09%	-6.09%	-6.09%	-6.09%	-5.95%	-5.95%	-5.95%
2020	345.004 Other Prod Info Sys Comp	0	0	0	0	NA	NA	NA	-2.33%	-6.09%	-6.09%	-6.09%	-5.95%	-5.95%	-5.95%
2004	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA									
2005	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA								
2006	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA							
2007	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA						
2008	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA	NA					
2009	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA	NA	NA				
2010	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA	NA	NA	NA			
2011	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA		
2012	345.045 Other Prod Acc El Eq-Wind	19,242	0	1,410	(1,410)	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	
2013	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%
2014	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%
2015	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%
2016	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%
2017	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA	NA	-7.33%	-7.33%	-7.33%	-7.33%	-7.33%
2018	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA	NA	NA	-7.33%	-7.33%	-7.33%	-7.33%
2019	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	-7.33%	-7.33%	-7.33%
2020	345.045 Other Prod Acc El Eq-Wind	0	0	0	0	NA	NA	NA	NA	NA	NA	NA	NA	-7.33%	-7.33%
2004	346 Other Prod Misc Pwr Plt Eq	0	0	0	0	NA									
2005	346 Other Prod Misc Pwr Plt Eq	4,931	0	0	0	0.00%	0.00%								
2006	346 Other Prod Misc Pwr Plt Eq	0	0	0	0	NA	0.00%	0.00%							
2007	346 Other Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	0.00%	0.00%						
2008	346 Other Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	NA	0.00%						
2009	346 Other Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	NA	NA	0.00%	0.00%				
2010	346 Other Prod Misc Pwr Plt Eq	0	0	0	0	NA	NA	NA	NA	NA	0.00%	0.00%			
2011	346 Other Prod Misc Pwr Plt Eq	55,973	0	7,042	(7,042)	-12.58%	-12.58%	-12.58%	-12.58%	-12.58%	-12.58%	-11.56%			
2012	346 Other Prod Misc Pwr Plt Eq	55,138	0	23,455	(23,455)	-42.54%	-27.45%	-27.45%	-27.45%	-27.45%	-27.45%	-26.28%	-26.28%		
2013	346 Other Prod Misc Pwr Plt Eq	50,394	0	28,644	(28,644)	-56.84%	-49.37%	-36.62%	-36.62%	-36.62%	-36.62%	-36.62%	-35.53%	-26.28%	
2014	346 Other Prod Misc Pwr Plt Eq	38,209	0	17,425	(17,425)	-45.61%	-52.00%	-48.37%	-38.34%	-38.34%	-38.34%	-38.34%	-38.34%	-35.53%	
2015	346 Other Prod Misc Pwr Plt Eq	45,946	0	2,139	(2,139)	-4.66%	-23.25%	-35.83%	-37.78%	-32.04%	-32.04%	-32.04%	-32.04%	-38.34%	
2016	346 Other Prod Misc Pwr Plt Eq	55,363	0	34,769	(34,769)	-62.80%	-36.43%	-38.94%	-43.69%	-43.43%	-37.70%	-37.70%	-37.70%	-32.04%	
2017	346 Other Prod Misc Pwr Plt Eq	0	0	0	0	NA	-62.80%	-36.43%	-38.94%	-43.69%	-43.43%	-37.70%	-37.70%	-37.70%	
2018	346 Other Prod Misc Pwr Plt Eq	12,625	0	49,577	(49,577)	-392.69%	-392.69%	-124.06%	-75.91%	-68.30%	-65.45%	-60.54%	-51.99%	-37.70%	
2019	346 Other Prod Misc Pwr Plt Eq	0	0	2,214	(2,214)	NA	-410.22%	-410.22%	-127.32%	-77.85%	-69.75%	-66.54%	-61.40%	-52.69%	-51.99%
2020	346 Other Prod Misc Pwr Plt Eq	109,880	0	3,927	(3,927)	-3.57%	-5.59%	-45.48%	-45.48%	-50.87%	-41.39%	-42.00%	-44.39%	-44.12%	-52.69%

PSCO DEPRECIATION STUDY AS OF DECEMBER 31, 2020
TRANSMISSION, DISTRIBUTION, AND GENERAL PLANT
RETIREMENTS REMOVAL COST AND NET SALVAGE ANALYSIS

FERC Account	Activity Year	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
350.2 Easements															
350	2000	0.00	0.00	0.00	0	NA									
350	2001	0.00	0.00	0.00	0	NA	NA								
350	2002	0.00	0.00	0.00	0	NA	NA	NA							
350	2003	0.00	0.00	0.00	0	NA	NA	NA	NA						
350	2004	0.00	0.00	0.00	0	NA	NA	NA	NA	NA					
350	2005	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA				
350	2006	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	NA			
350	2007	199,163.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
350	2008	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
350	2009	0.00	0.00	0.00	0	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
350	2010	56,286.07	0.00	4,354.66	(4,355)	-7.74%	-7.74%	-7.74%	-1.70%	-1.70%	-1.70%	-1.70%	-1.70%	-1.70%	-1.70%
350	2011	0.00	0.00	0.00	0	NA	-7.74%	-7.74%	-7.74%	-1.70%	-1.70%	-1.70%	-1.70%	-1.70%	-1.70%
350	2012	0.00	0.00	0.00	0	NA	NA	-7.74%	-7.74%	-1.70%	-1.70%	-1.70%	-1.70%	-1.70%	-1.70%
350	2013	0.00	0.00	0.00	0	NA	NA	NA	-7.74%	-7.74%	-1.70%	-1.70%	-1.70%	-1.70%	-1.70%
350	2014	0.00	0.00	0.00	0	NA	NA	NA	NA	-7.74%	-7.74%	-1.70%	-1.70%	-1.70%	-1.70%
350	2015	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	-7.74%	-7.74%	-1.70%	-1.70%	-1.70%
350	2016	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	-7.74%	-7.74%	-1.70%	-1.70%
350	2017	0.00	0.00	39,870.91	(39,871)	NA	NA	NA	NA	NA	NA	NA	-78.57%	-78.57%	-78.57%
350	2018	0.00	(2,400.00)	(34,923.25)	32,523	NA	NA	NA	NA	NA	NA	NA	NA	-20.79%	-20.79%
350	2019	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	-20.79%
350	2020	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
352	2000	0.00	0.00	0.00	0	NA									
352	2001	0.00	0.00	0.00	0	NA	NA								
352	2002	3,648.00	0.00	0.00	0	0.00%	0.00%	0.00%							
352	2003	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%						
352	2004	1.00	0.00	(293.48)	293	29348.00%	29348.00%	8.04%		8.04%					
352	2005	27,924.00	0.00	3,005.43	(3,005)	-10.76%	-9.71%	-9.71%	-8.59%	-8.59%	-8.59%				
352	2006	0.00	0.00	0.00	0	NA	-10.76%	-9.71%	-8.59%	-8.59%	-8.59%	-8.59%			
352	2007	15,247.00	0.00	3,122.77	(3,123)	-20.48%	-20.48%	-14.20%	-13.52%	-13.52%	-12.46%	-12.46%	-12.46%		
352	2008	18,229.00	0.00	2,376.38	(2,376)	-13.04%	-16.43%	-16.43%	-13.85%	-13.37%	-12.62%	-12.62%	-12.62%	-12.62%	
352	2009	16,600.00	0.00	1,427.83	(1,428)	-8.60%	-10.92%	-13.83%	-13.83%	-12.73%	-12.36%	-12.36%	-11.81%	-11.81%	-11.81%
352	2010	7,668.00	0.00	22,426.72	(22,427)	-292.47%	-98.30%	-61.72%	-50.83%	-50.83%	-37.77%	-37.43%	-37.43%	-35.90%	-35.90%
352	2011	7,659.00	660.37	1,618.90	(959)	-12.52%	-152.58%	-77.72%	-54.21%	-46.35%	-46.35%	-35.70%	-35.39%	-35.39%	-34.05%
352	2012	178,226.02	0.00	3,315.62	(3,316)	-1.86%	-2.30%	-13.80%	-13.38%	-13.36%	-13.80%	-13.80%	-13.49%	-13.38%	-13.38%
352	2013	44,890.28	5,363.00	42,789.38	(37,426)	-83.37%	-18.26%	-18.07%	-26.89%	-25.70%	-24.86%	-24.63%	-24.63%	-23.40%	-23.31%
352	2014	3,349.88	237.54	5,107.46	(4,870)	-145.38%	-87.68%	-20.14%	-19.89%	-28.54%	-27.25%	-26.32%	-26.01%	-26.01%	-24.68%
352	2015	1,884.00	24.87	16,240.27	(16,215)	-860.69%	-402.86%	-116.73%	-27.08%	-26.60%	-34.97%	-33.29%	-31.96%	-31.37%	-31.37%
352	2016	0.00	2,390.07	4,816.44	(2,426)	NA	-989.48%	-449.22%	-121.57%	-28.14%	-27.63%	-35.97%	-34.22%	-32.83%	-32.19%
352	2017	515,060.79	0.00	270,185.07	(270,185)	-52.46%	-52.93%	-55.87%	-56.45%	-58.59%	-44.99%	-44.66%	-47.16%	-46.33%	-45.57%
352	2018	868,642.83	17.12	29,828.35	(29,811)	-3.43%	-21.68%	-21.86%	-23.00%	-23.29%	-25.17%	-22.60%	-22.55%	-23.82%	-23.67%
352	2019	219,732.95	1,190.54	227,496.76	(226,306)	-102.99%	-23.53%	-32.82%	-32.97%	-33.95%	-34.18%	-35.51%	-32.24%	-32.16%	-33.24%
352	2020	1,088,099.99	1.62	820,447.13	(820,446)	-75.40%	-80.04%	-49.46%	-50.04%	-50.13%	-50.69%	-50.81%	-51.34%	-48.32%	-48.23%
353	2001	686,925.36	206,942.22	13,055.89	193,886	28.23%	28.23%								
353	2002	1,635,125.38	44,385.05	19,293.30	25,092	1.53%	9.43%	9.43%							
353	2003	346,638.72	0.00	4,097.00	(4,097)	-1.18%	1.06%	8.05%							
353	2004	83,365.02	0.00	124,617.00	(124,617)	-149.48%	-29.93%	-5.02%	3.28%	3.28%					
353	2005	3,551,938.41	0.00	177,052.00	(177,052)	-4.98%	-8.30%	-7.68%	-5.00%	-1.38%	-1.38%				
353	2006	5,637.00	0.00	20,398.00	(20,398)	-361.86%	-5.55%	-8.85%	-8.18%	-5.35%	-1.70%	-1.70%			
353	2007	1,133,831.22	0.00	181,976.65	(181,977)	-16.05%	-17.76%	-8.09%	-10.56%	-9.92%	-7.15%	-3.88%	-3.88%		
353	2008	1,734,637.00	9,602.90	244,230.85	(234,628)	-13.53%	-14.52%	-15.20%	-9.56%	-11.35%	-10.83%	-8.45%	-5.71%	-5.71%	
353	2009	1,865,375.25	49,250.61	1,013,833.99	(964,583)	-51.71%	-33.31%	-29.18%	-29.57%	-19.04%	-19.58%	-16.24%	-13.48%	-13.48%	-13.48%
353	2010	1,934,027.25	91,583.38	768,802.22	(677,219)	-35.02%	-43.21%	-33.91%	-30.87%	-31.15%	-22.06%	-23.09%	-22.38%	-19.20%	-16.69%
353	2011	6,946,627.48	99,919.39	713,175.66	(613,256)	-8.83%	-14.53%	-20.99%	-19.62%	-19.77%	-16.71%	-17.35%	-17.03%	-15.45%	-15.45%
353	2012	3,795,451.66	676,755.55	1,209,280.96	(532,525)	-14.03%	-10.67%	-14.38%	-19.17%	-18.57%	-18.40%	-18.52%	-16.22%	-16.75%	-16.50%
353	2013	2,747,575.00	237,977.89	1,306,456.72	(1,068,479)	-38.89%	-24.47%	-16.41%	-18.75%	-22.30%	-21.20%	-21.20%	-21.29%	-18.85%	-19.31%
353	2014	1,226,205.00	57,858.95	355,178.00	(297,319)	-24.25%	-34.37%	-24.43%	-17.07%	-19.15%	-22.43%	-21.67%	-21.37%	-21.46%	-19.11%
353	2015	928,149.01	11,734.18	278,958.25	(267,224)	-28.79%	-26.20%	-33.31%	-24.90%	-19.66%	-22.74%	-21.98%	-21.68%	-21.77%	
353	2016	1,467,878.08	250,805.33	262,236.28	(11,431)	-0.78%	-11.63%	-15.90%	-25.82%	-21.42%	-16.31%	-18.21%	-21.19%	-20.61%	-20.39%
353	2017	3,374,221.31	86,430.55	1,820,097.52	(1,733,667)	-51.38%	-36.04%	-34.87%	-33.01%	-28.88%	-28.88%	-22.08%	-23.20%	-25.39%	-24.60%
353	2018	6,064,843.19	10,916.33	1,917,507.61	(1,906,591)	-31.44%	-38.57%	-33.48%	-33.11%	-32.28%	-33.43%	-29.67%	-24.22%	-24.95%	-26.60%
353	2019	2,655,699.39	262,838.18	1,822,907.64	(1,560,069)	-58.74%	-39.75%	-43.00%	-38.43%	-37.81%	-36.75%	-37.07%	-33.14%	-27.36%	-27.83%
353	2020	2,901,657.19	261,781.19	1,606,490.34	(1,344,709)	-46.34%	-52.27%	-41.40%	-43.64%	-39.82%	-39.23%	-38.25%	-38.33%	-34.66%	-29.07%

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RETIREMENTS REMOVAL COST AND NET SALVAGE ANALYSIS

FERC Account	Activity Year	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
354	2000	0.00	0.00	0.00	0	NA									
354	2001	0.00	0.00	0.00	0	NA									
354	2002	280,099.35	0.00	27,501.09	(27,501)	-9.82%	-9.82%	-9.82%							
354	2003	0.00	0.00	0.00	0	NA	-9.82%	-9.82%	-9.82%						
354	2004	12,863.75	(18.00)	11,255.02	(11,273)	-87.63%	-87.63%	-13.24%	-13.24%	-13.24%					
354	2005	40,647.05	0.00	49,892.78	(49,893)	-122.75%	-114.31%	-114.31%	-26.58%	-26.58%	-26.58%				
354	2006	0.00	0.00	0.00	0	NA	-122.75%	-114.31%	-114.31%	-26.58%	-26.58%	-26.58%			
354	2007	412,883.75	113,113.89	16,480.42	96,633	23.40%	23.40%	10.31%	7.60%	7.60%	1.07%	1.07%			
354	2008	230,729.81	0.00	285,640.59	(285,641)	-123.80%	-29.37%	-29.37%	-34.91%	-35.89%	-35.89%	-28.41%	-28.41%	-28.41%	
354	2009	4,016.75	0.00	1,835,557.20	(1,835,557)	-45697.57%	-903.61%	-312.61%	-312.61%	-301.40%	-297.48%	-297.48%	-215.36%	-215.36%	-215.36%
354	2010	1,334,601.59	0.00	153,118.29	(153,118)	-11.47%	-148.56%	-144.92%	-109.86%	-109.86%	-110.12%	-109.98%	-109.98%	-97.86%	-97.86%
354	2011	4,342.00	1,294.00	49,588.00	(48,294)	-1112.25%	-15.04%	-151.68%	-147.59%	-112.05%	-112.05%	-112.27%	-112.11%	-112.11%	-99.76%
354	2012	7,513.00	737.00	15,918.00	(15,181)	-202.06%	-535.43%	-16.09%	-151.96%	-147.85%	-112.39%	-112.39%	-112.60%	-112.44%	-112.44%
354	2013	488,967.00	7,441.00	376,324.00	(368,883)	-75.44%	-77.36%	-86.33%	-31.90%	-131.62%	-130.75%	-105.11%	-105.11%	-105.40%	-105.31%
354	2014	16,030.25	979.20	5,004.06	(4,025)	-25.11%	-73.84%	-75.72%	-84.43%	-31.84%	-130.70%	-129.93%	-104.60%	-104.60%	-104.89%
354	2015	15,933.75	0.00	13,776.23	(13,776)	-86.46%	-55.69%	-74.23%	-76.05%	-84.49%	-32.31%	-130.32%	-129.61%	-104.49%	-104.49%
354	2016	0.00	379.60	1,355.16	(976)	NA	-92.58%	-58.74%	-74.42%	-76.23%	-84.67%	-32.36%	-130.37%	-129.65%	-104.52%
354	2017	26,301.00	19,338.28	183,850.50	(164,512)	-625.50%	-629.21%	-424.45%	-314.58%	-100.90%	-102.27%	-110.12%	-40.60%	-137.24%	-135.78%
354	2018	82,778.26	187.52	364,956.07	(364,769)	-440.66%	-485.23%	-486.12%	-435.18%	-388.57%	-145.54%	-146.21%	-152.74%	-57.35%	-149.92%
354	2019	17,045.04	(687.06)	220,625.22	(221,312)	-1298.40%	-587.12%	-595.12%	-595.90%	-538.75%	-486.67%	-175.91%	-176.21%	-182.38%	-67.96%
354	2020	84,392.85	268.43	91,744.79	(91,476)	-108.39%	-308.35%	-367.81%	-400.00%	-400.46%	-378.37%	-355.02%	-168.12%	-168.47%	-173.98%
355	2000	0.00	0.00	0.00	0	NA									
355	2001	0.00	0.00	0.00	0	NA									
355	2002	280,099.35	0.00	29,263.10	(29,263)	-10.45%	-10.45%	-10.45%							
355	2003	0.00	0.00	1,977.51	(1,978)	NA	-11.15%	-11.15%	-11.15%						
355	2004	12,863.75	0.00	2,781.09	(2,781)	-21.62%	-36.99%	-11.61%	-11.61%	-11.61%					
355	2005	40,647.05	40,000.00	11,391.23	28,609	70.38%	48.27%	44.57%	-1.62%	-1.62%	-1.62%				
355	2006	0.00	0.00	62,346.93	(62,347)	NA	-83.00%	-68.25%	-71.94%	-20.31%	-20.31%	-20.31%			
355	2007	1,892,595.87	432,168.61	152,890.16	279,278	14.76%	11.46%	12.70%	12.47%	12.37%	9.50%	9.50%	9.50%		
355	2008	242,743.26	0.00	411,955.51	(411,956)	-169.71%	-6.21%	-9.13%	-7.65%	-7.37%	-7.82%	-8.12%	-8.12%	-8.12%	
355	2009	95,206.98	0.00	182,389.79	(182,390)	-191.57%	-175.87%	-14.13%	-16.92%	-15.36%	-15.39%	-15.48%	-14.93%	-14.93%	-14.93%
355	2010	116,212.64	0.00	363,624.55	(363,625)	-312.90%	-258.26%	-210.93%	-28.92%	-31.58%	-29.84%	-29.88%	-27.85%	-27.85%	
355	2011	253,200.00	8,607.00	1,482,502.00	(1,473,895)	-582.11%	-497.42%	-434.74%	-343.79%	-82.79%	-85.19%	-82.80%	-82.50%	-82.57%	-75.69%
355	2012	536,504.00	1,345.00	485,449.00	(484,104)	-90.23%	-247.94%	-256.27%	-250.12%	-234.43%	-84.07%	-86.05%	-84.05%	-83.80%	-83.86%
355	2013	977,767.00	60,693.00	1,460,694.00	(1,400,001)	-143.18%	-124.42%	-189.99%	-197.57%	-197.28%	-194.27%	-98.12%	-99.63%	-97.97%	-97.73%
355	2014	395,998.30	0.00	871,980.80	(871,981)	-220.20%	-165.38%	-144.28%	-195.52%	-201.50%	-201.10%	-198.19%	-108.83%	-110.22%	-108.60%
355	2015	776,523.99	26,053.56	937,718.81	(911,665)	-117.40%	-152.12%	-148.06%	-136.51%	-174.89%	-180.13%	-180.48%	-179.71%	-110.09%	-111.27%
355	2016	0.00	1,272.59	53,708.57	(52,436)	NA	-124.16%	-156.59%	-150.50%	-138.46%	-176.67%	-181.85%	-182.14%	-181.25%	-111.08%
355	2017	1,684,924.36	33,622.61	2,524,087.43	(2,490,465)	-147.81%	-150.92%	-140.35%	-151.41%	-149.31%	-142.06%	-166.16%	-169.75%	-170.18%	-170.16%
355	2018	1,735,017.93	17,329.32	1,912,791.46	(1,895,462)	-109.25%	-128.25%	-129.78%	-127.49%	-135.48%	-136.83%	-132.74%	-150.63%	-153.54%	-154.09%
355	2019	770,286.68	(5,597.75)	2,650,719.04	(2,656,317)	-344.85%	-181.69%	-168.06%	-169.31%	-161.20%	-165.56%	-162.11%	-156.50%	-171.61%	-173.88%
355	2020	2,452,259.39	12,366.60	4,899,637.56	(4,887,271)	-199.30%	-234.09%	-190.40%	-179.59%	-180.38%	-173.79%	-176.14%	-172.48%	-167.75%	-178.70%
356	2000	0.00	0.00	0.00	0	NA									
356	2001	170.79	0.00	773.81	(774)	-453.08%	-453.08%								
356	2002	594,512.62	254,295.35	18,924.32	235,371	39.59%	39.45%	39.45%							
356	2003	1,109.03	9,795.60	1,733.83	8,062	726.92%	40.87%	40.73%	40.73%						
356	2004	158,986.13	0.00	4,698.74	(4,699)	-2.96%	2.10%	31.64%	31.53%	31.53%					
356	2005	764,331.66	0.00	16,984.27	(16,984)	-2.22%	-2.35%	-1.47%	14.60%	14.55%	14.55%				
356	2006	0.00	0.00	14,669.78	(14,670)	NA	-4.14%	-3.94%	-3.06%	13.63%	13.58%	13.58%			
356	2007	1,617,607.70	46,576.21	2,536.82	44,039	2.72%	1.82%	0.52%	0.30%	0.62%	8.01%	7.98%	7.98%		
356	2008	179,356.62	68,693.16	24,752.53	43,941	24.50%	4.90%	4.08%	2.20%	1.90%	2.19%	8.90%	8.87%	8.87%	
356	2009	465,377.49	(68,693.16)	39,540.36	(108,234)	-23.26%	-9.97%	-0.90%	-1.54%	-1.72%	-1.78%	-1.52%	4.94%	4.92%	4.92%
356	2010	452,367.60	284,573.47	305,394.02	(20,821)	-4.60%	-14.06%	-7.76%	-1.51%	-2.05%	-2.09%	-2.13%	-1.91%	3.92%	3.90%
356	2011	1,380,465.00	601,562.00	1,050,969.00	(449,407)	-32.55%	-25.66%	-25.17%	-21.57%	-11.98%	-12.34%	-10.74%	-10.50%	-10.33%	-5.05%
356	2012	275,156.00	3,158.00	270,022.00	(266,864)	-96.99%	-43.26%	-34.97%	-32.85%	-29.11%	-17.33%	-17.66%	-15.37%	-14.99%	-14.84%
356	2013	873,129.00	47,228.00	1,790,192.00	(1,742,964)	-199.62%	-175.03%	-97.25%	-83.19%	-75.10%	-70.17%	-47.68%	-47.96%	-42.14%	-41.13%
356	2014	68,734.73	25.91	24,212.02	(24,186)	-35.19%	-187.62%	-167.13%	-95.61%	-82.11%	-74.32%	-69.52%	-47.07%	-42.80%	-42.07%
356	2015	570,294.77	564,057.55	1,516,163.14	(952,126)	-166.95%	-152.78%	-179.83%	-167.07%	-108.45%	-95.48%	-87.25%	-82.55%	-59.10%	-59.35%
356	2016	0.00	386.59	21,137.04	(20,750)	NA	-170.59%	-156.03%	-181.20%	-168.24%	-109.11%	-96.05%	-87.76%	-83.04%	-59.45%
356	2017	546,709.95	32,571.69	568,990.19	(536,419)	-98.12%	-101.91%	-135.12%	-129.33%	-159.14%	-151.81%	-107.49%	-96.32%	-88.98%	-84.75%
356	2018	244,130.69	11,984.76	456,346.34	(444,362)	-182.02%	-124.02%	-126.64%	-143.53%	-138.32%	-161.56%	-154.67%	-112.09%	-101.06%	-93.64%
356	2019	1,175,193.50	597,447.23	1,545,933.45	(948,486)	-80.71%	-98.13%	-98.13%	-99.19%	-114.42%	-112.33%	-134.24%	-131.51%	-104.90%	-96.78%
356	2020	3,506,123.17	886,111.21	3,362,774.30	(2,476,663)	-70.64%	-73.17%	-78.56%	-80.52%	-80.89%	-89.02%	-88.41%	-102.31%	-102.11%	-91.00%

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FERC Account	Activity Year	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
357	2000	0.00	0.00	0.00	0	NA									
357	2001	0.00	0.00	0.00	0	NA		NA							
357	2002	0.00	0.00	0.00	0	NA		NA	NA						
357	2003	0.00	0.00	0.00	0	NA		NA	NA	NA					
357	2004	0.00	0.00	0.00	0	NA		NA	NA	NA	NA				
357	2005	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA			
357	2006	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA		
357	2007	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	
357	2008	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
357	2009	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
357	2010	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
357	2011	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
357	2012	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
357	2013	82,476.00	78,614.00	45,807.00	32,807	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%
357	2014	0.00	0.00	0.00	0	NA	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%
357	2015	0.00	0.00	0.00	0	NA		39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%
357	2016	0.00	0.00	0.00	0	NA		NA	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%
357	2017	0.00	0.00	0.00	0	NA		NA	NA	39.78%	39.78%	39.78%	39.78%	39.78%	39.78%
357	2018	0.00	0.00	0.00	0	NA		NA	NA	NA	39.78%	39.78%	39.78%	39.78%	39.78%
357	2019	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	39.78%	39.78%	39.78%	39.78%
357	2020	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	39.78%	39.78%	39.78%
358	2000	0.00	0.00	0.00	0	NA									
358	2001	0.00	0.00	0.00	0	NA		NA							
358	2002	5,481.19	0.00	0.00	0	0.00%	0.00%	0.00%							
358	2003	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%						
358	2004	0.00	0.00	1,178.25	(1,178)	NA	NA	-21.50%	-21.50%	-21.50%					
358	2005	0.00	0.00	0.00	0	NA	NA	NA	-21.50%	-21.50%	-21.50%				
358	2006	0.00	0.00	0.00	0	NA	NA	NA	NA	-21.50%	-21.50%	-21.50%			
358	2007	245,765.17	0.00	258,005.29	(258,005)	-104.98%	-104.98%	-104.98%	-105.46%	-105.46%	-103.16%	-103.16%	-103.16%		
358	2008	0.00	0.00	0.00	0	NA	-104.98%	-104.98%	-104.98%	-105.46%	-105.46%	-103.16%	-103.16%	-103.16%	
358	2009	0.00	0.00	0.00	0	NA	NA	-104.98%	-104.98%	-105.46%	-105.46%	-103.16%	-103.16%	-103.16%	-103.16%
358	2010	0.00	0.00	0.00	0	NA	NA	NA	-104.98%	-104.98%	-105.46%	-105.46%	-103.16%	-103.16%	-103.16%
358	2011	0.00	0.00	0.00	0	NA	NA	NA	NA	-104.98%	-104.98%	-105.46%	-105.46%	-103.16%	-103.16%
358	2012	0.00	0.00	0.00	0	NA	NA	NA	NA	-104.98%	-104.98%	-105.46%	-105.46%	-103.16%	-103.16%
358	2013	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	-104.98%	-104.98%	-105.46%	-105.46%	-103.16%
358	2014	1,320.86	0.00	5,425.33	(5,425)	-410.74%	-410.74%	-410.74%	-410.74%	-410.74%	-410.74%	-106.61%	-106.61%	-106.61%	-106.61%
358	2015	106,297.11	0.00	9,033.03	(9,033)	-8.50%	-13.43%	-13.43%	-13.43%	-13.43%	-13.43%	-13.43%	-13.43%	-13.43%	-13.43%
358	2016	0.00	0.00	0.00	0	NA	-8.50%	-13.43%	-13.43%	-13.43%	-13.43%	-13.43%	-13.43%	-13.43%	-13.43%
358	2017	76,417.47	0.00	9,636.09	(9,636)	-12.61%	-12.61%	-10.22%	-13.09%	-13.09%	-13.09%	-13.09%	-13.09%	-13.09%	-13.09%
358	2018	131,207.92	0.00	54,615.73	(54,616)	-41.63%	-30.95%	-30.95%	-23.34%	-24.97%	-24.97%	-24.97%	-24.97%	-24.97%	-24.97%
358	2019	150,691.97	0.00	52,685.00	(52,685)	-34.96%	-38.06%	-32.63%	-32.63%	-27.11%	-28.20%	-28.20%	-28.20%	-28.20%	-28.20%
358	2020	150,000.00	0.00	55,241.24	(55,241)	-36.83%	-35.89%	-37.63%	-33.87%	-33.87%	-29.48%	-30.30%	-30.30%	-30.30%	-30.30%
359	2000	0.00	0.00	0.00	0	NA									
359	2001	0.00	0.00	0.00	0	NA		NA							
359	2002	0.00	0.00	0.00	0	NA		NA	NA						
359	2003	0.00	0.00	0.00	0	NA		NA	NA	NA					
359	2004	0.00	0.00	0.00	0	NA		NA	NA	NA	NA				
359	2005	2,536.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
359	2006	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
359	2007	0.00	0.00	0.00	0	NA		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
359	2008	0.00	0.00	0.00	0	NA		NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
359	2009	0.00	0.00	0.00	0	NA		NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
359	2010	0.00	0.00	0.00	0	NA		NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%
359	2011	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%
359	2012	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	0.00%	0.00%	0.00%
359	2013	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	0.00%	0.00%
359	2014	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	0.00%
359	2015	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
359	2016	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
359	2017	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
359	2018	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
359	2019	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA
359	2020	0.00	0.00	0.00	0	NA		NA	NA	NA	NA	NA	NA	NA	NA

PSCO DEPRECIATION STUDY AS OF DECEMBER 31, 2020
TRANSMISSION, DISTRIBUTION, AND GENERAL PLANT
RETIREMENTS REMOVAL COST AND NET SALVAGE ANALYSIS

FERC Account	Activity Year	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
360 Easements															
360	2000	0.00	0.00	0.00	0	NA									
360	2001	0.00	0.00	0.00	0	NA		NA							
360	2002	2,221.99	0.00	0.00	0	0.00%	0.00%	0.00%							
360	2003	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%						
360	2004	0.00	0.00	71.27	(71)	NA	NA	-3.21%	-3.21%	-3.21%					
360	2005	0.00	0.00	0.00	0	NA	NA	NA	-3.21%	-3.21%	-3.21%				
360	2006	0.00	0.00	0.00	0	NA	NA	NA	NA	-3.21%	-3.21%	-3.21%			
360	2007	181.00	0.00	0.00	0	0.00%	0.00%	0.00%	-39.38%	-39.38%	-2.97%	-2.97%	-2.97%		
360	2008	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	-39.38%	-39.38%	-2.97%	-2.97%	-2.97%	-2.97%
360	2009	14,095.09	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	-0.50%	-0.50%	-0.43%	-0.43%	-0.43%
360	2010	4,146.15	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	-0.39%	-0.39%	-0.35%	-0.35%	-0.35%
360	2011	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-0.39%	-0.39%	-0.35%
360	2012	0.00	0.00	0.00	0	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-0.39%	-0.39%
360	2013	0.00	0.00	0.00	0	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-0.39%
360	2014	0.00	0.00	0.00	0	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
360	2015	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%
360	2016	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%
360	2017	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%
360	2018	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%
360	2019	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.00%
360	2020	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
361	2000	0.00	0.00	0.00	0	NA									
361	2001	0.00	1,814.89	72.03	1,743	NA	NA								
361	2002	147,390.36	0.00	40,071.96	(40,072)	-27.19%	-26.01%	-26.01%							
361	2003	15,689.00	0.00	0.00	0	0.00%	-24.57%	-23.50%	-23.50%						
361	2004	0.00	0.00	0.00	0	NA	0.00%	-24.57%	-23.50%	-23.50%					
361	2005	462,625.78	0.00	(27,488.36)	27,488	5.94%	5.94%	5.75%	-2.01%	-1.73%	-1.73%				
361	2006	0.00	0.00	0.00	0	NA	5.94%	5.94%	5.75%	-2.01%	-1.73%	-1.73%			
361	2007	0.00	0.00	4,294.74	(4,295)	NA	NA	5.01%	5.01%	4.85%	-2.70%	-2.42%	-2.42%		
361	2008	21,462.00	0.00	11,239.30	(11,239)	-52.37%	-72.38%	-72.38%	2.47%	2.39%	-4.34%	-4.08%	-4.08%		
361	2009	53,750.00	0.00	15,365.83	(15,366)	-28.59%	-35.37%	-41.08%	-0.63%	-0.63%	-0.62%	-6.20%	-5.96%	-5.96%	-5.96%
361	2010	114,515.75	0.00	4,153.11	(4,153)	-3.63%	-11.60%	-16.21%	-18.48%	-18.48%	-1.16%	-1.16%	-1.13%	-5.84%	-5.63%
361	2011	66,346.00	0.00	35,244.96	(35,245)	-53.12%	-21.78%	-23.34%	-25.78%	-27.45%	-27.45%	-5.96%	-5.83%	-5.83%	-9.40%
361	2012	20,377.00	0.00	7,648.99	(7,649)	-37.54%	-49.46%	-23.38%	-24.48%	-26.64%	-28.20%	-28.20%	-6.83%	-6.83%	-6.69%
361	2013	27,060.42	0.00	17,084.15	(17,084)	-63.13%	-52.14%	-52.71%	-28.09%	-28.19%	-29.90%	-31.31%	-8.82%	-8.82%	
361	2014	16,327.00	2,834.53	25,614.08	(22,780)	-139.52%	-91.88%	-74.51%	-63.61%	-35.53%	-34.28%	-35.49%	-36.83%	-36.83%	-11.54%
361	2015	89,368.55	0.00	28,276.68	(28,277)	-31.64%	-48.30%	-51.33%	-49.49%	-50.59%	-34.49%	-33.67%	-34.65%	-35.70%	-35.70%
361	2016	18,260.45	688.11	2,270.73	(1,583)	-8.67%	-27.74%	-42.47%	-46.17%	-45.14%	-47.37%	-33.15%	-32.55%	-33.54%	-34.55%
361	2017	483,537.59	21,179.38	335,385.18	(314,206)	-64.98%	-62.93%	-58.20%	-60.39%	-60.50%	-59.79%	-59.18%	-51.56%	-50.18%	-50.23%
361	2018	44,282.36	0.00	287,457.49	(287,457)	-649.15%	-113.99%	-110.47%	-99.38%	-100.39%	-98.90%	-97.11%	-93.30%	-81.63%	-78.58%
361	2019	253,139.92	790.35	137,422.04	(136,632)	-53.97%	-142.59%	-94.54%	-92.57%	-86.45%	-87.40%	-86.70%	-85.65%	-83.53%	-75.45%
361	2020	390,804.95	8,738.48	148,063.12	(139,325)	-35.65%	-42.85%	-81.86%	-74.90%	-73.88%	-70.93%	-71.79%	-71.62%	-71.10%	-70.25%
362	2000	0.00	0.00	0.00	0	NA									
362	2001	714,953.75	300,065.75	16,288.78	283,777	39.69%	39.69%								
362	2002	2,065,404.07	22,768.75	40,221.02	(17,452)	-0.84%	9.58%	9.58%							
362	2003	638,612.40	0.00	36,886.46	(36,886)	-5.78%	-2.01%	6.71%	6.71%						
362	2004	290,537.50	0.00	111,980.46	(111,980)	-38.54%	-16.02%	-5.55%	3.17%	3.17%					
362	2005	6,883,906.32	0.00	674,973.89	(674,974)	-9.81%	-10.97%	-10.54%	-8.52%	-5.26%	-5.26%				
362	2006	374,542.79	0.00	72,896.59	(72,897)	-19.46%	-10.30%	-11.39%	-10.95%	-8.92%	-5.75%	-5.75%			
362	2007	1,897,494.80	161,058.44	651,078.10	(490,020)	-25.82%	-24.78%	-13.52%	-14.29%	-13.75%	-11.56%	-8.71%	-8.71%		
362	2008	2,074,855.71	0.00	196,569.82	(196,570)	-9.47%	-17.28%	-17.47%	-12.77%	-13.42%	-13.02%	-11.25%	-8.82%	-8.82%	
362	2009	1,964,666.93	83,031.17	292,950.19	(209,919)	-10.68%	-10.06%	-15.10%	-12.77%	-12.46%	-13.02%	-12.70%	-11.18%	-9.03%	-9.03%
362	2010	600,159.55	3,475.00	543,779.85	(540,305)	-90.03%	-29.25%	-20.41%	-21.98%	-21.84%	-15.84%	-16.30%	-15.85%	-14.00%	-11.81%
362	2011	683,577.27	55,463.00	112,931.31	(57,468)	-8.41%	-46.57%	-24.86%	-18.87%	-20.69%	-15.49%	-15.94%	-15.94%	-15.52%	-13.78%
362	2012	1,461,974.37	104,051.49	1,450,621.31	(1,346,570)	-92.11%	-65.44%	-70.81%	-45.73%	-34.65%	-32.72%	-32.17%	-22.51%	-22.80%	-22.15%
362	2013	2,880,189.78	56,594.00	324,769.27	(268,175)	-9.31%	-37.19%	-33.27%	-39.33%	-31.91%	-27.10%	-26.89%	-26.65%	-20.49%	-20.77%
362	2014	483,726.20	46,230.42	302,080.70	(255,850)	-52.89%	-15.58%	-38.76%	-35.00%	-40.40%	-33.17%	-28.33%	-27.93%	-27.68%	-21.30%
362	2015	2,534,405.62	90,595.57	1,707,365.12	(1,616,770)	-63.79%	-62.05%	-36.29%	-47.38%	-44.07%	-40.49%	-35.41%	-34.17%	-33.80%	
362	2016	275,564.33	57,481.95	98,849.51	(41,368)	-15.01%	-59.01%	-58.11%	-35.35%	-46.21%	-43.11%	-46.26%	-39.84%	-34.98%	-33.81%
362	2017	4,267,888.90	11,329.66	1,022,374.17	(1,011,045)	-23.69%	-23.16%	-37.71%	-38.68%	-30.58%	-38.14%	-36.52%	-38.96%	-35.29%	-32.18%
362	2018	2,532,478.29	13,257.54	549,661.74	(536,404)	-21.18%	-22.76%	-22.45%	-33.36%	-34.29%	-28.75%	-35.16%	-33.95%	-36.09%	-33.27%
362	2019	3,369,603.52	42,683.73	1,697,841.18	(1,655,157)	-49.12%	-37.13%	-31.49%	-31.06%	-37.45%	-38.00%	-32.95%	-37.72%	-38.39%	
362	2020	4,819,248.26	79,689.85	1,847,810.18	(1,768,120)	-36.69%	-41.80%	-36.93%	-33.16%	-32.83%	-37.24%	-37.66%	-33.80%	-37.57%	-36.71%

**PSCO DEPRECIATION STUDY AS OF DECEMBER 31, 2020
TRANSMISSION, DISTRIBUTION, AND GENERAL PLANT
RETIREMENTS REMOVAL COST AND NET SALVAGE ANALYSIS**

FERC Account	Activity Year	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2-yr Net Salv. %	3-yr Net Salv. %	4-yr Net Salv. %	5-yr Net Salv. %	6-yr Net Salv. %	7-yr Net Salv. %	8-yr Net Salv. %	9-yr Net Salv. %	10-yr Net Salv. %
364	2000	470,567.33	243.39	17,754.16	(17,511)	-3.72%									
364	2001	7,132,451.95	2,950.10	366,280.70	(363,331)	-5.09%	-5.01%								
364	2002	3,132,409.50	143,584.11	957,123.18	(813,539)	-25.97%	-11.47%	-11.13%							
364	2003	902,310.81	80.74	488,726.42	(488,646)	-54.15%	-32.27%	-14.91%	-14.46%						
364	2004	2,085,084.21	219,921.53	834,198.48	(614,277)	-29.46%	-36.92%	-31.32%	-17.20%						
364	2005	4,210,521.30	178,217.93	3,061,331.42	(2,883,113)	-68.47%	-55.55%	-46.46%	-55.38%	-29.57%	-28.89%				
364	2006	4,219,588.11	80,133.00	1,245,162.00	(1,165,029)	-27.61%	-48.02%	-44.34%	-45.12%	-40.99%	-29.18%	-28.64%			
364	2007	2,822,924.76	1,671,744.06	2,866,887.00	(1,195,143)	-42.34%	-33.51%	-43.92%	-44.56%	-41.21%	-30.70%	-30.19%			
364	2008	3,888,984.06	(548.97)	2,111,300.32	(2,111,849)	-54.30%	-49.27%	-48.57%	-46.26%	-46.65%	-43.61%	-33.93%	-33.44%		
364	2009	3,537.51	3,254.35	1,919,017.24	(1,915,763)	-54155.69%	-103.47%	-77.77%	-58.42%	-61.21%	-57.37%	-57.21%	-52.61%	-40.67%	-40.07%
364	2010	613,441.16	(22,104.07)	1,046,454.65	(1,068,559)	-174.19%	-483.70%	-113.10%	-85.84%	-64.57%	-65.61%	-61.39%	-61.04%	-56.02%	-43.50%
364	2011	845,544.26	609,440.34	2,376,527.87	(1,767,088)	-208.99%	-194.36%	-128.25%	-98.58%	-74.42%	-72.91%	-68.06%	-67.42%	-61.71%	
364	2012	571,842.85	599,077.27	2,662,509.39	(2,063,432)	-360.84%	-270.25%	-241.24%	-334.99%	-150.70%	-115.73%	-87.05%	-82.50%	-76.76%	-75.74%
364	2013	1,081,382.09	714,614.39	3,130,829.46	(2,416,215)	-223.44%	-249.99%	-235.05%	-296.27%	-161.93%	-127.58%	-97.55%	-90.84%	-84.55%	
364	2014	897,972.00	437,298.00	3,333,278.00	(2,895,980)	-322.50%	-268.38%	-289.10%	-269.16%	-254.63%	-302.14%	-180.18%	-143.90%	-111.07%	-101.70%
364	2015	1,023,427.52	387,355.47	2,729,114.02	(2,341,759)	-228.82%	-272.60%	-254.90%	-271.84%	-259.82%	-249.38%	-287.24%	-185.75%	-151.30%	
364	2016	661,279.07	248,576.67	5,814,964.47	(5,566,388)	-841.76%	-469.41%	-418.33%	-360.81%	-335.55%	-318.17%	-351.59%	-231.00%	-188.09%	
364	2017	719,073.11	350,849.33	9,190,195.15	(8,839,346)	-1229.27%	-1043.63%	-696.71%	-594.94%	-503.29%	-486.85%	-446.34%	-420.31%	-449.93%	-300.65%
364	2018	526,142.65	1,772,078.93	2,785,523.88	(1,013,445)	-192.62%	-791.25%	-808.77%	-606.19%	-539.64%	-469.99%	-458.60%	-425.24%	-403.05%	-430.44%
364	2019	1,165,071.43	241,530.48	9,570,858.47	(9,329,328)	-800.75%	-611.56%	-795.84%	-805.73%	-661.55%	-600.57%	-533.43%	-518.58%	-483.64%	-460.22%
364	2020	1,964,712.11	339,702.89	12,398,476.70	(12,058,774)	-613.77%	-683.37%	-612.75%	-714.08%	-730.84%	-646.06%	-604.30%	-553.07%	-540.30%	-510.68%
365	2000	618,892.17	387.28	20,024.85	(19,638)	-3.17%									
365	2001	3,586,925.22	1,430.12	773,298.60	(771,868)	-21.52%	-18.82%								
365	2002	5,301,207.01	(70.51)	1,097,821.74	(1,097,892)	-20.71%	-21.04%	-19.87%							
365	2003	1,719,875.08	2,254.12	854,181.17	(851,927)	-49.53%	-27.77%	-25.66%	-24.42%						
365	2004	3,615,048.10	(10,579.12)	1,814,603.45	(1,825,183)	-50.49%	-50.18%	-35.49%	-31.97%	-30.77%					
365	2005	8,334,975.58	210,243.64	1,271,862.31	(1,061,619)	-12.74%	-24.16%	-27.35%	-25.49%	-24.86%	-24.28%				
365	2006	5,028,613.50	182,686.13	639,449.15	(456,763)	-9.08%	-11.36%	-19.69%	-22.44%	-22.06%	-21.99%	-21.57%			
365	2007	3,415,532.01	450,912.07	1,809,290.04	(1,358,378)	-39.77%	-21.50%	-17.14%	-23.06%	-25.11%	-24.26%	-23.95%			
365	2008	5,098,627.89	0.05	2,212,886.99	(2,212,887)	-43.40%	-41.95%	-29.74%	-23.26%	-27.12%	-28.54%	-27.26%	-26.69%	-26.30%	
365	2009	1,732,183.05	3,063.84	1,727,816.69	(1,724,753)	-99.57%	-57.65%	-51.69%	-37.66%	-28.86%	-31.73%	-32.79%	-30.92%	-30.03%	-29.60%
365	2010	1,558,552.24	9,006.48	1,115,760.91	(1,106,754)	-71.01%	-86.04%	-60.13%	-54.24%	-40.75%	-31.47%	-33.86%	-34.74%	-32.67%	-31.65%
365	2011	1,819,042.85	337,954.00	2,845,082.43	(2,507,128)	-137.83%	-107.00%	-104.48%	-73.97%	-65.40%	-50.22%	-38.64%	-40.04%	-40.55%	-37.75%
365	2012	1,778,151.21	180,188.00	2,483,830.05	(2,303,642)	-129.55%	-133.74%	-114.78%	-110.95%	-82.22%	-72.81%	-57.12%	-44.28%	-44.96%	-45.19%
365	2013	2,921,729.13	412,486.00	4,558,459.90	(4,145,974)	-141.90%	-137.23%	-137.40%	-124.59%	-120.17%	-93.92%	-83.82%	-67.73%	-53.26%	-52.98%
365	2014	2,822,491.69	143,609.54	3,976,691.95	(3,833,082)	-135.80%	-138.91%	-136.69%	-136.92%	-127.49%	-123.66%	-100.58%	-90.76%	-75.07%	-60.01%
365	2015	3,610,836.22	199,286.96	2,909,306.56	(2,710,020)	-75.05%	-101.71%	-114.26%	-116.70%	-119.67%	-114.44%	-112.86%	-96.26%	-88.47%	-75.07%
365	2016	2,344,376.52	122,339.90	5,270,154.40	(5,147,815)	-219.58%	-131.95%	-133.19%	-135.96%	-134.60%	-134.98%	-129.07%	-128.32%	-108.47%	-99.81%
365	2017	2,623,367.63	179,682.17	6,083,589.56	(5,903,907)	-225.05%	-222.47%	-160.42%	-154.33%	-151.79%	-149.34%	-148.17%	-141.99%	-138.53%	-120.09%
365	2018	2,566,799.32	1,109,991.13	4,499,041.01	(3,389,050)	-132.03%	-179.05%	-191.66%	-153.88%	-150.23%	-148.79%	-146.96%	-146.15%	-140.83%	-137.83%
365	2019	2,735,325.42	148,523.03	5,082,153.51	(4,933,630)	-180.37%	-156.97%	-179.50%	-188.65%	-159.10%	-155.16%	-153.19%	-151.23%	-150.18%	-145.20%
365	2020	4,162,846.52	282,064.82	9,174,926.23	(8,892,861)	-213.62%	-200.44%	-181.89%	-191.25%	-195.86%	-171.68%	-166.83%	-163.77%	-161.39%	-159.82%
366	2000	29,350.87	103.26	64.53	39	0.13%									
366	2001	457,990.85	0.00	18,210.21	(18,210)	-3.98%	-3.73%								
366	2002	718,798.89	23.27	54,706.09	(54,683)	-7.61%	-6.19%	-6.04%							
366	2003	100,819.98	174.84	66,088.64	(65,914)	-65.38%	-14.71%	-10.86%	-10.62%						
366	2004	1,170,666.12	7.06	65,323.24	(65,316)	-5.58%	-10.32%	-9.34%	-8.34%	-8.24%					
366	2005	2,526,547.22	2,850.00	51,666.99	(48,817)	-1.93%	-3.09%	-4.74%	-5.20%	-5.08%	-5.05%				
366	2006	630,060.85	0.00	47,359.04	(47,359)	-7.52%	-3.05%	-3.73%	-5.14%	-5.48%	-5.36%	-5.33%			
366	2007	547,841.26	8,555.71	165,393.29	(156,838)	-28.63%	-17.34%	-6.83%	-6.53%	-7.72%	-7.71%	-7.43%			
366	2008	725,984.03	0.00	315,104.54	(315,105)	-43.40%	-37.05%	-27.28%	-12.82%	-11.31%	-12.27%	-11.74%	-11.23%	-11.18%	
366	2009	306,514.80	0.00	415,731.69	(415,732)	-135.63%	-70.78%	-56.17%	-42.30%	-20.77%	-17.76%	-18.56%	-17.39%	-16.53%	-16.47%
366	2010	211,281.91	0.00	170,403.79	(170,404)	-80.60%	-113.20%	-72.46%	-59.06%	-45.65%	-23.33%	-19.93%	-20.67%	-19.31%	-18.37%
366	2011	426,068.80	92,071.00	426,892.89	(334,822)	-78.58%	-79.27%	-97.57%	-74.02%	-62.81%	-50.58%	-27.71%	-23.75%	-24.38%	-22.74%
366	2012	270,496.31	6,014.00	241,320.74	(235,307)	-86.99%	-81.85%	-85.57%	-75.83%	-65.44%	-53.73%	-30.55%	-26.83%		
366	2013	391,385.39	57,889.00	431,567.50	(373,679)	-95.48%	-92.01%	-86.75%	-85.76%	-95.28%	-79.13%	-69.52%	-58.39%	-34.76%	-30.02%
366	2014	188,391.43	90,657.32	452,338.85	(361,682)	-191.98%	-126.84%	-114.16%	-102.28%	-99.21%	-105.43%	-87.56%	-77.04%	-65.19%	-59.52%
366	2015	279,736.53	84,447.15	702,272.98	(617,826)	-220.86%	-209.24%	-157.44%	-140.57%	-123.60%	-118.47%	-121.00%	-100.88%	-89.06%	-76.14%
366	2016	364,889.18	3,003.50	1,505,862.15	(1,502,859)	-411.87%	-328.98%	-298.00%	-233.26%	-206.79%	-178.36%	-168.68%	-164.52%	-136.74%	-120.78%
366	2017	246,485.75	222,720.21	2,312,198.41	(2,089,478)	-847.71%	-587.58%	-472.46%	-423.51%	-336.23%	-297.51%	-254.48%	-239.04%	-227.23%	-188.11%
366	2018	189,069.60	33,635.10	1,352,689.58	(1,319,054)	-697.66%	-782.57%	-613.58%	-511.88%	-464.37%	-377.39%	-336.70%	-290.03%	-272.81%	-258.18%
366	2019	309,511.96	56,540.12	1,586,399.56	(1,529,859)	-494.28%	-571.40%	-662.81%	-580.32%	-507.96%	-470.24%	-395.76%	-358.48%	-313.75%	-296.63%
366	2020	176,969.23	369,112.82	464,941.91	(95,829)	-54.15%	-334.17%	-445.90%	-545.99%	-507.96%	-456.70%	-428.28%	-367.60%	-336.19%	-297.59%

PSCC DEPRECIATION STUDY AS OF DECEMBER 31, 2020
TRANSMISSION, DISTRIBUTION, AND GENERAL PLANT
RETIREMENTS REMOVAL COST AND NET SALVAGE ANALYSIS

FERC Account	Activity Year	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
367	2000	523,792.35	2,023.81	2,378.91	(355)	-0.07%									
367	2001	5,007,877.63	1,135.74	105,151.23	(104,015)	-2.08%	-1.89%								
367	2002	12,924,070.96	94,869.75	435,063.66	(340,194)	-2.63%	-2.48%	-2.41%							
367	2003	2,645,750.23	148,280.32	311,290.14	(163,010)	-6.16%	-3.23%	-2.95%	-2.88%						
367	2004	9,696,223.33	367,491.57	686,544.22	(319,053)	-3.29%	-3.91%	-3.25%	-3.06%	-3.01%					
367	2005	13,738,113.48	495,860.97	802,623.19	(306,762)	-2.23%	-2.67%	-3.02%	-2.89%	-2.80%	-2.77%				
367	2006	12,337,006.19	362,595.29	239,868.17	142,727	1.16%	-0.63%	-1.35%	-1.68%	-1.92%	-1.93%	-1.92%			
367	2007	8,412,160.99	204,049.57	1,926,114.08	(1,722,065)	-20.47%	-7.61%	-5.47%	-4.99%	-5.06%	-4.53%	-4.34%	-4.31%		
367	2008	15,512,757.74	42,987.00	1,741,857.50	(1,698,871)	-10.95%	-14.30%	-9.04%	-7.17%	-6.54%	-6.52%	-5.86%	-5.62%	-5.58%	
367	2009	4,699,695.02	3,024.02	1,321,899.17	(1,318,875)	-28.06%	-14.93%	-16.56%	-11.22%	-8.97%	-8.11%	-8.03%	-7.16%	-6.86%	-6.82%
367	2010	6,014,233.25	2,996.03	1,266,535.54	(1,263,540)	-21.01%	-24.10%	-16.32%	-17.33%	-12.48%	-10.16%	-9.21%	-9.10%	-8.13%	-7.80%
367	2011	7,740,850.72	450,050.52	2,192,758.52	(1,742,708)	-22.51%	-21.86%	-23.44%	-17.73%	-18.28%	-13.90%	-11.56%	-10.53%	-10.39%	-9.32%
367	2012	8,846,411.54	710,475.24	1,620,582.96	(910,108)	-10.29%	-15.99%	-17.33%	-19.18%	-16.20%	-16.90%	-13.39%	-11.41%	-10.51%	-10.38%
367	2013	10,865,105.52	481,775.02	2,618,630.71	(2,136,856)	-19.67%	-15.46%	-17.45%	-18.09%	-16.90%	-17.38%	-14.31%	-12.43%	-11.52%	
367	2014	11,483,720.00	190,009.00	2,168,675.00	(1,978,666)	-17.23%	-18.41%	-16.11%	-17.38%	-17.87%	-18.83%	-16.96%	-17.36%	-14.70%	-12.98%
367	2015	11,381,327.66	116,348.91	2,312,111.41	(2,195,763)	-19.29%	-18.26%	-18.71%	-16.96%	-17.82%	-18.16%	-18.92%	-17.30%	-17.62%	-15.24%
367	2016	11,768,504.20	34,469.83	5,030,340.19	(4,995,870)	-42.45%	-31.07%	-26.48%	-24.85%	-22.48%	-22.48%	-22.35%	-22.72%	-20.66%	-20.64%
367	2017	6,202,296.76	431,154.22	7,949,443.46	(7,518,289)	-121.22%	-69.64%	-50.12%	-40.87%	-36.41%	-32.60%	-31.45%	-30.61%	-30.46%	-27.25%
367	2018	4,648,781.43	245,945.70	5,453,939.08	(5,207,993)	-112.03%	-117.28%	-78.35%	-58.58%	-48.14%	-42.65%	-38.26%	-36.59%	-35.40%	-34.99%
367	2019	5,984,975.81	27,940.60	1,834,257.50	(1,806,317)	-30.18%	-65.96%	-86.32%	-68.27%	-54.33%	-46.05%	-41.45%	-37.58%	-36.10%	-35.03%
367	2020	3,006,211.77	850,073.40	3,075,140.77	(2,225,067)	-74.02%	-44.84%	-67.74%	-84.45%	-68.82%	-55.71%	-47.60%	-42.95%	-39.06%	-37.49%
368	2000	8,331.53	0.00	0.00	0	0.00%									
368	2001	3,176,921.52	20,616.63	28,798.73	(8,182)	-0.26%	-0.26%								
368	2002	61,043.64	0.00	0.00	0	0.00%	-0.25%	-0.25%							
368	2003	3,362,421.96	0.00	0.00	0	0.00%	0.00%	-0.12%	-0.12%						
368	2004	121,313.55	23,003.84	42,673.00	(19,669)	-16.21%	-0.56%	-0.55%	-0.41%	-0.41%					
368	2005	1,786,182.49	12,437.67	308,308.00	(295,870)	-16.56%	-16.54%	-5.99%	-5.92%	-3.80%	-3.80%				
368	2006	5,240,215.62	50,622.53	(48,147.18)	98,770	1.88%	-2.81%	-3.03%	-2.06%	-2.05%	-1.64%	-1.64%			
368	2007	2,214,599.76	68,636.12	1,479,854.78	(1,411,219)	-63.72%	-17.61%	-17.40%	-17.39%	-12.79%	-12.73%	-10.25%	-10.24%		
368	2008	2,467,947.66	(53,912.00)	133,947.00	(187,859)	-7.61%	-34.15%	-15.12%	-15.34%	-11.95%	-11.90%	-9.90%	-9.89%		
368	2009	2,460,840.87	0.00	98,485.00	(98,485)	-4.00%	-5.81%	-23.76%	-12.91%	-13.37%	-13.40%	-10.84%	-10.81%	-9.20%	-9.20%
368	2010	2,111,973.65	0.00	7,999.00	(7,999)	-0.38%	-2.33%	-4.18%	-18.43%	-11.08%	-11.72%	-9.73%	-9.70%	-8.39%	
368	2011	3,012,987.98	5,262.64	92,625.84	(87,363)	-2.90%	-1.86%	-2.66%	-3.80%	-14.61%	-9.68%	-10.31%	-10.35%	-8.82%	-8.80%
368	2012	2,962,226.15	0.00	311,998.87	(311,999)	-10.53%	-6.68%	-5.04%	-4.80%	-5.33%	-13.82%	-9.80%	-10.34%	-10.37%	-9.02%
368	2013	2,601,256.90	525.37	67,866.54	(67,341)	-2.59%	-6.82%	-5.44%	-4.44%	-4.36%	-4.87%	-12.18%	-8.99%	-9.53%	-9.56%
368	2014	1,972,382.00	177.99	3,316,666.00	(3,316,488)	-168.15%	-73.99%	-49.04%	-35.86%	-29.94%	-25.72%	-23.18%	-27.72%	-21.52%	-21.19%
368	2015	4,568,932.42	20,891.16	714,048.57	(693,157)	-15.17%	-61.30%	-44.59%	-36.26%	-29.61%	-26.03%	-23.27%	-21.53%	-25.36%	-20.54%
368	2016	2,729,222.23	0.00	322,955.25	(322,955)	-11.83%	-13.92%	-46.74%	-37.06%	-31.76%	-26.89%	-24.09%	-21.88%	-20.47%	-24.00%
368	2017	1,234,638.49	1,858.11	89,443.74	(87,586)	-7.09%	-10.36%	-12.93%	-42.08%	-34.24%	-29.87%	-25.61%	-23.10%	-21.11%	-19.83%
368	2018	2,987,685.57	2,706,331.76	1,226,524.13	1,479,808	49.53%	32.97%	15.38%	3.26%	-21.79%	-18.69%	-17.42%	-15.44%	-14.12%	-13.19%
368	2019	5,619,627.00	1,581,265.58	3,043,562.53	(1,462,297)	-26.02%	0.20%	-0.71%	-3.13%	-6.34%	-23.04%	-20.59%	-19.38%	-17.59%	-16.37%
368	2020	2,720,138.23	537,148.60	203,909.56	333,239	12.25%	-13.54%	3.10%	2.09%	-0.39%	-3.79%	-18.64%	-16.93%	-16.24%	-14.92%
369	2000	9,501.13	0.00	42.68	(43)	-0.45%									
369	2001	793.95	0.00	512.92	(513)	-64.60%	-5.40%								
369	2002	177,202.24	0.00	162,928.16	(162,928)	-91.94%	-91.82%	-87.19%							
369	2003	327,264.00	0.00	48,436.64	(48,437)	-14.80%	-41.90%	-41.93%	-41.17%						
369	2004	215,804.00	20,488.97	53,947.24	(33,458)	-15.50%	-15.08%	-33.99%	-34.02%	-33.59%					
369	2005	3,998,069.00	0.00	948,041.26	(948,041)	-23.71%	-23.29%	-22.68%	-25.28%	-25.29%	-25.24%				
369	2006	984,839.00	0.00	171,590.83	(171,591)	-17.42%	-22.47%	-22.18%	-21.74%	-23.92%	-23.93%	-23.89%			
369	2007	45,312.00	123,429.78	922,701.40	(799,272)	-1763.93%	-94.24%	-38.16%	-37.23%	-35.91%	-37.64%				
369	2008	3,356,594.00	(0.23)	453,498.25	(453,498)	-13.51%	-36.83%	-32.47%	-28.29%	-27.97%	-27.49%	-28.74%	-28.75%	-28.72%	
369	2009	565,560.00	(0.04)	382,344.58	(382,345)	-67.60%	-21.31%	-41.21%	-36.48%	-30.78%	-30.42%	-29.88%	-31.02%	-31.02%	-30.99%
369	2010	670,549.00	0.18	354,512.98	(354,513)	-52.87%	-59.61%	-25.92%	-42.90%	-38.44%	-32.32%	-31.95%	-31.40%	-32.43%	-32.44%
369	2011	732,755.00	33,993.00	589,013.85	(555,021)	-75.74%	-64.81%	-65.62%	-32.77%	-47.38%	-42.74%	-35.39%	-34.99%	-34.38%	-35.30%
369	2012	998,627.00	49,117.00	818,574.44	(769,457)	-77.05%	-76.50%	-69.90%	-39.76%	-52.03%	-47.40%	-39.06%	-38.62%	-37.96%	
369	2013	2,148.00	150,011.00	925,079.08	(775,068)	-36063.24%	-154.33%	-121.11%	-102.08%	-95.51%	-52.00%	-64.18%	-57.92%	-45.87%	-45.31%
369	2014	44,139.35	2,709.80	827,094.40	(824,385)	-1867.69%	-3455.49%	-226.71%	-164.48%	-133.91%	-121.47%	-64.58%	-76.59%	-68.71%	-62.93%
369	2015	584,897.19	72,328.52	1,191,078.99	(1,118,750)	-191.27%	-308.91%	-430.65%	-213.99%	-171.11%	-144.97%	-132.81%	-75.24%	-86.17%	-77.69%
369	2016	1,676,415.01	372,110.16	2,784,185.77	(2,412,076)	-143.88%	-156.14%	-188.91%	-222.32%	-178.44%	-159.81%	-144.58%	-136.33%	-88.57%	-97.32%
369	2017	3,262,886.80	34,865.05	2,335,607.75	(2,300,743)	-70.51%	-95.41%	-105.56%	-119.53%	-133.40%	-124.83%	-119.91%	-114.27%	-111.18%	-83.62%
369	2018	166,274.61	135,377.49	1,350,570.76	(1,215,193)	-730.84%	-102.53%	-116.11%	-123.83%	-137.26%	-150.72%	-139.79%	-133.51%	-126.87%	-123.02%
369	2019	206,967.69	1,599.16	1,112,420.81	(1,110,822)	-536.71%	-623.19%	-127.24%	-132.49%	-138.32%	-151.17%	-164.16%	-151.63%	-144.38%	-137.03%
369	2020	129,089.50	706.13	356,864.83	(356,159)	-275.90%	-436.53%	-533.94%	-132.34%	-135.90%	-141.27%	-153.82%	-166.53%	-153.90%	-146.56%

PSCO DEPRECIATION STUDY AS OF DECEMBER 31, 2020
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RETIREMENTS REMOVAL COST AND NET SALVAGE ANALYSIS

FERC Account	Activity Year	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
370	2000	1,935.00	0.00	0.00	0	0.00%									
370	2001	10,445,378.63	210,814.04	0.00	210,814	2.02%									
370	2002	7,586.30	33,563.16	463.95	33,099	436.30%	2.33%								
370	2003	8,893,468.23	101,593.20	0.00	101,593	-	1.51%	1.79%							
370	2004	3,173,069.92	0.00	0.00	0	0.00%	0.84%	1.12%	1.53%						
370	2005	519,394.00	0.00	0.00	0	0.00%	0.00%	0.81%	1.07%	1.50%					
370	2006	9,878,713.86	0.00	0.00	0	0.00%	0.00%	0.00%	0.45%	0.60%					
370	2007	3,294,815.30	654,904.26	2,297,812.45	(1,642,908)	-49.86%	-12.47%	-12.00%	-9.74%	-5.96%	-5.85%	-3.58%			
370	2008	2,468,357.73	0.00	103.81	(104)	0.00%	-28.51%	-10.50%	-10.17%	-8.50%	-5.46%	-5.34%	-3.35%		
370	2009	2,855,541.14	0.00	0.00	0	0.00%	0.00%	-19.06%	-8.88%	-8.64%	-7.40%	-4.96%	-4.85%	-3.12%	
370	2010	2,592,904.96	0.00	0.00	0	0.00%	0.00%	0.00%	-14.65%	-7.79%	-7.60%	-6.63%	-4.58%	-4.48%	-2.94%
370	2011	2,814,002.54	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	-11.71%	-6.87%	-6.73%	-5.95%	-4.22%	-4.13%
370	2012	3,476,579.12	0.00	73.84	(74)	0.00%	0.00%	0.00%	0.00%	0.00%	-9.39%	-6.00%	-5.89%	-5.29%	-3.86%
370	2013	2,787,067.00	0.00	558.47	(558)	-0.02%	-0.01%	-0.01%	-0.01%	0.00%	0.00%	-8.10%	-5.45%	-5.36%	-4.85%
370	2014	2,871,044.95	42,190.83	2,830,714.00	(2,788,523)	-97.13%	-49.29%	-30.53%	-23.34%	-19.18%	-16.03%	-14.04%	-19.14%	-13.41%	-13.21%
370	2015	2,826,928.35	0.00	573,121.08	(573,121)	-20.27%	-59.00%	-39.63%	-28.11%	-22.76%	-19.36%	-16.63%	-14.82%	-19.26%	-13.96%
370	2016	3,292,943.94	0.00	0.00	0	0.00%	-9.36%	-37.39%	-28.55%	-22.04%	-18.61%	-16.27%	-14.30%	-12.94%	-17.09%
370	2017	3,340,215.21	0.00	0.00	0	0.00%	0.00%	-6.06%	-27.24%	-22.24%	-18.08%	-15.71%	-14.01%	-12.52%	-11.47%
370	2018	3,168,380.37	8,723.20	0.00	8,723	0.28%	0.13%	0.09%	-4.47%	-21.63%	-18.34%	-15.41%	-13.64%	-12.34%	-11.17%
370	2019	3,042,708.06	2,155.90	2,342,584.84	(2,340,429)	-76.92%	-37.54%	-24.41%	-18.15%	-18.54%	-30.70%	-22.95%	-20.62%	-18.85%	-18.37%
370	2020	3,380,057.06	(2,582.80)	(781.48)	(1,801)	-0.05%	-36.47%	-24.33%	-18.05%	-14.38%	-15.26%	-25.98%	-23.05%	-20.21%	-18.37%
						NA	-0.05%	-36.47%	-24.33%	-18.05%	-14.38%	-15.26%	-25.98%	-23.05%	-20.21%
370.2	2000	0.00	0.00	0.00	0	NA									
370.2	2001	0.00	0.00	0.00	0	NA	NA								
370.2	2002	0.00	0.00	0.00	0	NA	NA	NA							
370.2	2003	0.00	0.00	0.00	0	NA	NA	NA	NA						
370.2	2004	0.00	0.00	0.00	0	NA	NA	NA	NA	NA					
370.2	2005	2,640,496.76	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
370.2	2006	1,218,944.84	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%			
370.2	2007	1,184,397.34	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%		
370.2	2008	926,997.39	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	
370.2	2009	934,477.09	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2010	898,598.19	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2011	674,452.37	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2012	728,000.41	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2013	700,604.81	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2014	773,095.92	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2015	1,028,563.04	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2016	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2017	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2018	3,349,972.25	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2019	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%
370.2	2020	0.00	0.00	0.00	0	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
370.02	2015	0.00	0.00	0.00	0	NA									
370.02	2016	0.00	0.00	0.00	0	NA	NA								
370.02	2017	0.00	0.00	0.00	0	NA	NA	NA							
370.02	2018	0.00	0.00	0.00	0	NA	NA	NA	NA						
370.02	2019	0.00	0.00	0.00	0	NA	NA	NA	NA	NA					
370.02	2020	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA				
371	2000	293.38	0.00	0.00	0	0.00%									
371	2001	41,113.22	0.00	1,477.12	(1,477)	-3.59%	-3.57%								
371	2002	3,663.42	0.00	504.61	(505)	-13.77%	-4.43%	-4.40%							
371	2003	21,090.22	0.00	4,310.29	(4,310)	-20.44%	-19.45%	-9.55%	-9.51%						
371	2004	64,609.04	0.00	26,573.22	(26,573)	-41.13%	-36.04%	-35.12%	-25.19%	-25.13%					
371	2005	253,642.13	219.93	57,732.82	(57,513)	-22.67%	-26.42%	-26.05%	-25.92%	-23.53%	-23.51%				
371	2006	16,582.15	0.00	12,159.04	(12,159)	-73.33%	-25.78%	-28.74%	-28.25%	-28.10%	-25.59%	-25.57%			
371	2007	5,925.40	155.55	13,718.23	(13,563)	-228.89%	-114.28%	-30.14%	-32.22%	-31.54%	-31.36%	-28.55%	-28.53%		
371	2008	1,709.16	0.00	10,318.99	(10,319)	-603.75%	-312.81%	-148.83%	-33.67%	-35.08%	-34.23%	-34.02%	-30.96%	-30.94%	
371	2009	0.00	0.00	14.49	(14)	NA	-604.59%	-313.00%	-148.89%	-33.67%	-35.08%	-34.23%	-34.03%	-30.96%	-30.94%
371	2010	0.00	0.00	0.00	0	NA	NA	-604.59%	-313.00%	-148.89%	-33.67%	-35.08%	-34.23%	-34.03%	-30.96%
371	2011	2,234.34	0.00	0.00	0	0.00%	0.00%	-0.65%	-262.04%	-242.14%	-136.31%	-33.41%	-34.85%	-34.02%	-33.82%
371	2012	343.73	0.00	0.00	0	0.00%	0.00%	0.00%	-0.56%	-241.03%	-233.99%	-134.56%	-33.37%	-34.82%	-33.99%
371	2013	(343.73)	0.00	1,068.29	(1,068)		310.79%	NA	-47.81%	-47.81%	-48.46%	-289.13%	-252.96%	-140.35%	-35.16%
371	2014	165.88	0.00	225.00	(225)	-135.64%	727.18%	-779.65%	-53.88%	-53.88%	-54.49%	-282.93%	-251.02%	-140.32%	-33.85%
371	2015	0.00	0.00	0.00	0	NA	-135.64%	727.18%	-779.65%	-53.88%	-53.88%	-54.49%	-282.93%	-251.02%	-140.32%
371	2016	4,777.79	0.00	5,665.23	(5,665)	-118.57%	-118.57%	-119.15%	-151.27%	-140.76%	-96.94%	-96.94%	-97.14%	-194.57%	-208.30%
371	2017	43,373.52	0.00	10,375.76	(10,376)	-23.92%	-33.31%	-33.31%	-36.13%	-35.88%	-34.29%	-34.29%	-34.29%	-34.32%	-52.94%
371	2018	0.00	0.00	0.00	0	NA	-23.92%	-33.31%	-33.31%	-33.67%	-36.13%	-35.88%	-34.29%	-34.32%	-34.32%
371	2019	0.00	0.00	0.00	0	NA	NA	-23.92%	-33.31%	-33.67%	-36.13%	-35.88%	-34.29%	-34.32%	-34.32%
371	2020	0.00	0.00	0.00	0	NA	NA	NA	-23.92%	-33.31%	-33.31%	-33.67%	-36.13%	-35.88%	-34.29%

PSCO DEPRECIATION STUDY AS OF DECEMBER 31, 2020
TRANSMISSION, DISTRIBUTION, AND GENERAL PLANT
RETIREMENTS REMOVAL COST AND NET SALVAGE ANALYSIS

FERC Account	Activity Year	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
373	2000	98,205.47	173,644.65	324,446.67	(150,802)	-153.56%									
373	2001	1,713,403.65	213,178.42	258,742.58	(45,564)	-2.66%	-10.84%								
373	2002	1,748,839.38	173,644.65	324,446.67	(150,802)	-8.62%	-5.67%	-9.75%							
373	2003	645,565.66	213,178.42	258,742.58	(45,564)	-7.06%	-8.20%	-5.89%	-9.34%						
373	2004	1,418,230.08	173,644.65	324,446.67	(150,802)	-10.63%	-9.51%	-9.11%	-7.11%	-9.66%					
373	2005	2,337,524.91	213,178.42	258,742.58	(45,564)	-1.95%	-5.23%	-5.50%	-6.39%	-5.57%					
373	2006	4,341,019.85	36,687.93	324,624.27	(287,936)	-6.63%	-4.99%	-5.98%	-6.06%	-6.49%	-5.95%	-7.13%			
373	2007	2,423,135.67	140,803.36	702,038.67	(561,235)	-23.16%	-12.55%	-9.63%	-9.94%	-9.77%	-9.62%	-8.80%			
373	2008	5,390,446.44	0.00	1,006,445.47	(1,006,445)	-18.67%	-20.06%	-15.27%	-13.12%	-12.90%	-12.67%	-12.28%	-11.46%	-12.15%	
373	2009	4,864,507.09	(0.10)	967,673.99	(967,674)	-19.89%	-19.25%	-20.00%	-16.59%	-14.82%	-14.54%	-14.31%	-13.88%	-13.11%	-13.66%
373	2010	2,619,644.68	612.38	882,911.55	(882,299)	-33.68%	-24.72%	-22.19%	-22.34%	-18.87%	-17.07%	-16.68%	-16.42%	-15.89%	-15.07%
373	2011	1,839,154.90	13,724.00	1,009,303.66	(995,580)	-54.13%	-42.12%	-30.52%	-26.18%	-25.75%	-21.89%	-19.93%	-19.41%	-19.10%	-18.44%
373	2012	2,877,154.04	20,055.00	907,547.69	(887,493)	-30.85%	-39.93%	-37.70%	-30.60%	-26.94%	-26.49%	-22.95%	-21.11%	-20.58%	-20.28%
373	2013	3,612,483.65	17,247.00	1,428,748.29	(1,411,501)	-39.07%	-35.43%	-39.56%	-38.15%	-32.53%	-29.01%	-28.41%	-25.03%	-23.25%	-22.69%
373	2014	2,247,265.00	72,276.00	1,193,647.00	(1,121,371)	-49.90%	-43.22%	-39.15%	-41.75%	-40.15%	-34.69%	-31.01%	-30.28%	-26.88%	-25.09%
373	2015	3,380,778.57	38,227.02	849,364.80	(811,138)	-23.99%	-34.34%	-36.19%	-34.92%	-37.45%	-36.86%	-33.01%	-30.13%	-29.55%	-26.59%
373	2016	1,637,097.61	146,934.38	2,593,020.20	(2,446,086)	-149.42%	-64.91%	-60.27%	-53.23%	-48.55%	-49.21%	-46.97%	-41.26%	-36.99%	-35.90%
373	2017	3,809,530.95	103,871.76	2,444,189.41	(2,340,318)	-61.43%	-87.88%	-63.41%	-60.67%	-55.36%	-51.34%	-51.61%	-49.47%	-44.12%	-39.87%
373	2018	9,978,293.21	21,891.60	1,299,776.89	(1,277,885)	-12.81%	-26.24%	-39.31%	-36.56%	-37.98%	-38.14%	-37.38%	-38.43%	-38.04%	-35.65%
373	2019	17,211,635.73	29,767.51	2,796,198.74	(2,766,431)	-16.07%	-14.87%	-20.60%	-27.06%	-26.77%	-28.13%	-29.07%	-29.19%	-30.17%	-30.36%
373	2020	2,593,750.55	460,037.97	2,255,034.56	(1,794,997)	-69.20%	-23.03%	-19.61%	-24.35%	-30.16%	-29.62%	-30.74%	-31.41%	-31.38%	-32.23%
390	2000	0.00	0.00	0.00	0	NA									
390	2001	0.00	0.00	0.00	0	NA	NA								
390	2002	3,500.00	2,430.28	3,362.79	(933)	-26.64%	-26.64%	-26.64%							
390	2003	4,290,174.48	0.00	22,786.81	(22,787)	-0.53%	-0.55%	-0.55%	-0.55%						
390	2004	0.00	0.00	0.00	0	NA	-0.53%	-0.55%	-0.55%	-0.55%					
390	2005	136,750.16	0.00	0.00	0	0.00%	0.00%	-0.51%	-0.54%		-0.54%				
390	2006	0.00	0.00	0.00	0	NA	0.00%	0.00%	-0.51%	-0.54%	-0.54%	-0.54%			
390	2007	926,847.78	0.00	1.19	(1)	0.00%	0.00%	0.00%	0.00%	-0.43%	-0.44%	-0.44%	-0.44%		
390	2008	23,794.20	0.00	25,445.56	(25,446)	-106.94%	-2.68%	-2.68%	-2.34%	-2.34%	-0.90%	-0.91%	-0.91%	-0.91%	
390	2009	0.00	0.00	38,615.13	(38,615)	NA	-269.23%	-6.74%	-5.89%	-5.89%	-5.89%	-1.62%	-1.63%	-1.63%	-1.63%
390	2010	50,179.00	0.00	0.00	0	0.00%	-76.95%	-86.60%	-6.40%	-5.63%	-5.63%	-1.60%	-1.62%	-1.62%	-1.62%
390	2011	0.00	0.00	0.00	0	NA	-76.95%	-86.60%	-6.40%	-5.63%	-5.63%	-5.63%	-1.60%	-1.62%	-1.62%
390	2012	3,092.00	0.00	0.00	0	0.00%	0.00%	0.00%	-72.49%	-83.13%	-6.38%	-5.62%	-5.62%	-5.62%	-1.60%
390	2013	362,704.84	2,810.51	88,693.05	(85,883)	-23.68%	-23.48%	-23.48%	-20.65%	-29.93%	-34.10%	-10.97%	-10.97%	-9.97%	-9.97%
390	2014	8,529.72	0.00	2,503.10	(2,503)	-29.35%	-23.81%	-23.61%	-23.61%	-20.82%	-29.92%	-34.01%	-11.09%	-11.09%	-10.08%
390	2015	37,516.92	0.00	20,240.85	(20,241)	-53.95%	-49.39%	-26.58%	-26.38%	-23.51%	-31.87%	-35.55%	-12.22%	-12.22%	-12.22%
390	2016	0.00	0.00	0.00	0	NA	-53.95%	-49.39%	-26.58%	-26.38%	-23.51%	-31.87%	-35.55%	-12.22%	-12.22%
390	2017	126,180.00	(100.00)	234,722.54	(234,823)	-186.10%	-186.10%	-155.81%	-149.55%	-64.20%	-63.84%	-63.84%	-58.39%	-64.95%	-66.59%
390	2018	0.00	0.00	0.00	0	NA	-186.10%	-186.10%	-155.81%	-149.55%	-64.20%	-63.84%	-63.84%	-58.39%	-64.95%
390	2019	(207.00)	0.00	0.00	0	0.00%	0.00%	-186.41%	-186.41%	-156.01%	-149.73%	-63.86%	-63.86%	-58.41%	-63.86%
390	2020	0.00	0.00	0.00	0	NA	0.00%	0.00%	-186.41%	-186.41%	-156.01%	-149.73%	-64.23%	-63.86%	-63.86%
391	2000	535.00	0.00	0.00	0	0.00%									
391	2001	121,034.73	0.00	0.00	0	0.00%	0.00%								
391	2002	16,807.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%						
391	2003	19,262.38	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%						
391	2004	1,842.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%					
391	2005	815,826.68	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
391	2006	744,866.88	41.00	0.00	41	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
391	2007	226,363.92	0.00	1.17	(1)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
391	2008	821,471.22	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
391	2009	4,057,823.15	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
391	2010	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
391	2011	25,474.25	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
391	2012	182,255.18	0.00	1,507.50	(1,508)	-0.83%	-0.73%	-0.73%	-0.04%	-0.03%	-0.03%	-0.02%	-0.02%	-0.02%	-0.02%
391	2013	2,824.97	0.00	0.00	0	0.00%	-0.81%	-0.72%	-0.72%	-0.04%	-0.03%	-0.03%	-0.02%	-0.02%	-0.02%
391	2014	20,280.28	0.00	0.00	0	0.00%	0.00%	-0.73%	-0.65%	-0.04%	-0.03%	-0.03%	-0.03%	-0.02%	-0.02%
391	2015	0.01	0.00	337.58	(338)	-3375800.00%	-1.66%	-1.46%	-0.90%	-0.80%	-0.80%	-0.04%	-0.04%	-0.03%	-0.03%
391	2016	0.00	0.00	0.00	0	NA	-3375800.00%	-1.66%	-1.46%	-0.90%	-0.80%	-0.80%	-0.04%	-0.04%	-0.03%
391	2017	1,351,752.99	0.00	0.00	0	0.00%	0.00%	-0.02%	-0.02%	-0.02%	-0.12%	-0.12%	-0.12%	-0.03%	-0.03%
391	2018	20,732.00	0.00	0.00	0	0.00%	0.00%	0.00%	-0.02%	-0.02%	-0.12%	-0.12%	-0.12%	-0.03%	-0.03%
391	2019	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	-0.02%	-0.02%	-0.12%	-0.12%	-0.12%	-0.12%
391	2020	54,917.17	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	-0.02%	-0.02%	-0.02%	-0.11%	-0.11%
3912	2015	1,581,120.20	0.00	7,505.25	(7,505)	-0.47%									
3912	2016	724,030.16	0.00	0.00	0	0.00%	NA								
3912	2017	8,708.23	0.00	0.00	0	0.00%	0.00%	-0.32%							
3912	2018	334,743.35	0.00	0.00	0	0.00%	0.00%	0.00%	-0.28%						
3912	2019	868,059.93	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	-0.21%					
3912	2020	875,492.22	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	-0.17%				

FERC Account	Activity Year	2010				2011		2-yr Net Salv. %	3-yr Net Salv. %	4-yr Net Salv. %	5-yr Net Salv. %	6-yr Net Salv. %	7-yr Net Salv. %	8-yr Net Salv. %	9-yr Net Salv. %	10-yr Net Salv. %
		Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %										
393	2000	0.00	0.00	0.00	0	NA										
	2001	3,498.00	0.00	0.00	0	0.00%	0.00%									
	2002	7,404.00	0.00	0.00	0	0.00%	0.00%	0.00%								
	2003	363.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%							
	2004	103.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%						
	2005	11,634.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
	2006	3,189.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
	2007	588,699.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
	2008	817,991.22	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
	2009	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	2010	0.00	0.00	0.00	0	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	2011	0.00	0.00	0.00	0	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	2012	0.00	0.00	0.00	0	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	2013	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	2014	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%
	2015	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%
	2016	0.00	0.00	0.00	0	NA	NA	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%
	2017	117,243.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	2018	41,409.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	2019	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2020	8,314.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
394	2000	0.00	0.00	0.00	0	NA										
	2001	35,436.00	0.00	0.00	0	0.00%	0.00%									
	2002	34,818.00	0.00	0.00	0	0.00%	0.00%	0.00%								
	2003	18,337.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%							
	2004	38,917.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%						
	2005	0.00	0.00	0.00	0	NA	0.00%	0.00%	0.00%	0.00%	0.00%					
	2006	66,449.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
	2007	324,214.70	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
	2008	172,586.00	0.00	0.00	0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
	2009	0.00	0.00	0.00	0	NA	0.00									

**PSCO DEPRECIATION STUDY AS OF DECEMBER 31, 2020
COMMON GENERAL PLANT
RETIREMENTS, GROSS SALVAGE, AND REMOVAL COST ANALYSIS**

FERC	Activity	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2- yr	3- yr	4- yr	5- yr	6- yr	7- yr	8- yr	9- yr	10- yr
	Year						Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %	Net Salv. %
Structures and Improvements															
390 390,,390.06, 390.08	1998	1,913,177.00	0.00	0.00	0.00	0.00%									
390 390,,390.06, 390.08	1999	761,023.00	0.00	0.00	0.00	0.00%	0.00%								
390 390,,390.06, 390.08	2000	0.00	0.00	0.00	0.00	NA	0.00%	0.00%							
390 390,,390.06, 390.08	2001	0.00	0.00	0.00	0.00	NA	NA	0.00%	0.00%						
390 390,,390.06, 390.08	2002	20,495.00	0.00	(141.81)	141.81	0.69%	0.69%	0.69%	0.02%	0.01%					
390 390,,390.06, 390.08	2003	0.00	0.00	0.00	0.00	NA	0.69%	0.69%	0.69%	0.02%		0.01%			
390 390,,390.06, 390.08	2004	16,411.00	0.00	0.00	0.00	0.00%	0.00%	0.38%	0.38%	0.38%	0.02%	0.01%			
390 390,,390.06, 390.08	2005	660,965.75	0.00	1,375.51	(1,375.51)	-0.21%	-0.20%	-0.20%	-0.18%	-0.18%	-0.18%	-0.08%	-0.04%		
390 390,,390.06, 390.08	2006	0.00	0.00	0.00	0.00	NA	-0.21%	-0.20%	-0.20%	-0.18%	-0.18%	-0.18%	-0.08%	-0.04%	
390 390,,390.06, 390.08	2007	1,784,351.31	0.00	103,123.54	(103,123.54)	-5.78%	-5.78%	-4.27%	-4.24%	-4.24%	-4.20%	-4.20%	-4.20%	-3.22%	-2.02%
390 390,,390.06, 390.08	2008	5,503.81	0.00	162,953.28	(162,953.28)	-2960.74%	-14.87%	-14.87%	-10.91%	-10.84%	-10.84%	-10.75%	-10.75%	-10.75%	-8.23%
390 390,,390.06, 390.08	2009	920,402.04	0.00	0.00	0.00	0.00%	-17.60%	-9.82%	-9.82%	-7.93%	-7.89%	-7.89%	-7.84%	-7.84%	-7.84%
390 390,,390.06, 390.08	2010	48,205.00	0.00	1,031.35	(1,031.35)	-2.14%	-0.11%	-16.83%	-9.68%	-9.68%	-7.85%	-7.81%	-7.81%	-7.76%	-7.76%
390 390,,390.06, 390.08	2011	1,927,039.58	755.05	607,743.25	(606,988.20)	-31.50%	-30.78%	-21.00%	-26.57%	-18.66%	-18.66%	-16.37%	-16.32%	-16.32%	-16.26%
390 390,,390.06, 390.08	2012	2,002,495.39	47,496.36	108,507.83	(61,011.47)	-3.05%	-17.00%	-16.82%	-13.66%	-16.97%	-13.98%	-13.98%	-12.74%	-12.71%	-12.71%
390 390,,390.06, 390.08	2013	1,001,111.79	41,647.46	546,710.96	(505,063.50)	-50.45%	-18.85%	-23.79%	-23.58%	-19.90%	-22.64%	-18.73%	-18.73%	-17.26%	-17.23%
390 390,,390.06, 390.08	2014	972,410.22	1,688.96	119,379.96	(117,691.00)	-12.10%	-31.56%	-17.20%	-21.87%	-21.71%	-18.80%	-21.15%	-17.99%	-17.99%	-16.73%
390 390,,390.06, 390.08	2015	647,382.94	37,211.84	44,513.12	(7,301.28)	-1.13%	-7.72%	-24.04%	-14.95%	-19.82%	-19.69%	-17.28%	-19.43%	-16.81%	-16.81%
390 390,,390.06, 390.08	2016	2,771,298.19	5,631.47	65,709.23	(60,077.76)	-2.17%	-1.97%	-4.21%	-12.80%	-10.16%	-14.57%	-14.51%	-13.21%	-14.78%	-13.45%
390 390,,390.06, 390.08	2017	1,091,061.29	197,213.80	270,928.02	(73,714.22)	-6.76%	-3.46%	-3.13%	-4.72%	-11.78%	-9.72%	-13.75%	-13.70%	-12.59%	-14.01%
390 390,,390.06, 390.08	2018	132,482.97	(197,186.84)	230,499.30	(427,686.14)	-322.82%	-40.98%	-14.06%	-12.25%	-12.23%	-18.01%	-14.53%	-17.63%	-17.56%	-16.16%
390 390,,390.06, 390.08	2019	1,211,186.77	0.00	216,207.22	(216,207.22)	-17.85%	-47.92%	-29.47%	-14.94%	-13.41%	-13.22%	-17.99%	-14.94%	-17.66%	-17.59%
390 390,,390.06, 390.08	2020	4,100,081.16	1,282.50	185,454.23	(184,171.73)	-4.49%	-7.54%	-15.21%	-13.80%	-10.34%	-9.74%	-9.95%	-13.35%	-11.87%	-14.25%
Office Furniture and Equipment															
391	1998	406,022.00	0.00	0.00	0.00	0.00%									
391	1999	0.00	0.00	0.00	0.00	NA	0.00%								
391	2000	13,372.00	0.00	0.00	0.00	0.00%	0.00%	0.00%							
391	2001	8,302,580.42	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%						
391	2002	2,957,084.51	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%					
391	2003	1,184,539.96	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
391	2004	238,704.95	(5,908.64)	0.00	(5,908.64)	-2.48%	-0.42%	-0.13%	-0.05%	-0.05%	-0.05%	-0.05%			
391	2005	15,359,586.35	1,304.51	0.00	1,304.51	0.01%	-0.03%	-0.03%	-0.02%	-0.02%	-0.02%	-0.02%	-0.02%	-0.02%	
391	2006	826,908.00	260.00	0.00	260.00	0.03%	0.01%	-0.03%	-0.02%	-0.02%	-0.02%	-0.02%	-0.02%	-0.01%	
391	2007	524,994.49	2,018.57	5,163.77	(3,145.20)	-0.60%	-0.21%	-0.01%	-0.04%	-0.04%	-0.04%	-0.03%	-0.03%	-0.03%	-0.03%
391	2008	0.00	942.00	0.00	942.00	NA	-0.42%	-0.14%	0.00%	-0.04%	-0.04%	-0.03%	-0.02%	-0.02%	-0.02%
391	2009	0.00	0.00	0.00	0.00	NA	NA	-0.42%	-0.14%	0.00%	-0.04%	-0.04%	-0.03%	-0.02%	-0.02%
391	2010	0.00	0.00	0.00	0.00	NA	NA	NA	-0.42%	-0.14%	0.00%	-0.04%	-0.04%	-0.03%	-0.02%
391	2011	0.00	0.00	11,965.10	(11,965.10)	NA	NA	NA	NA	-2.70%	-1.03%	-0.08%	-0.11%	-0.10%	-0.09%
391	2012	0.00	0.00	500.25	(500.25)	NA	NA	NA	NA	NA	-2.79%	-1.07%	-0.08%	-0.11%	-0.10%
391	2013	0.00	231,098.00	231,213.55	(115.55)	NA	NA	NA	NA	NA	NA	-2.82%	-1.07%	-0.08%	-0.11%
391	2014	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	-2.82%	-1.07%	-0.08%
391	2015	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	NA	-2.82%	-1.07%
391	2016	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	-2.82%
391	2017	15,268,425.80	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-0.08%	-0.08%	-0.08%	-0.08%
391	2018	2,178,938.61	0.00	16,165.84	(16,165.84)	-0.74%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.10%	-0.16%	-0.16%	-0.16%
391	2019	139,330.14	0.00	0.00	0.00	0.00%	-0.70%	-0.09%	-0.09%	-0.09%	-0.09%	-0.09%	-0.10%	-0.16%	-0.16%
391	2020	3,320,454.75	0.00	1.48	(1.48)	0.00%	0.00%	-0.29%	-0.08%	-0.08%	-0.08%	-0.08%	-0.08%	-0.08%	-0.14%

PSCO DEPRECIATION STUDY AS OF DECEMBER 31, 2020
COMMON GENERAL PLANT
RETIREMENTS, GROSS SALVAGE, AND REMOVAL COST ANALYSIS

FERC	Activity			Removal	Net	Net	Net	Net	Net	Net	Net	Net	Net	Net	Net
	Year	Retirements	Salvage	Cost	Salvage	Salv. %	Salv. %	Salv. %	Salv. %	Salv. %	Salv. %	Salv. %	Salv. %	Salv. %	Salv. %
Tools and Shop Equipment															
394	1998	78,230.00	0.00	0.00	0.00	0.00%									
394	1999	0.00	0.00	0.00	0.00	NA	0.00%								
394	2000	0.00	0.00	0.00	0.00	NA	NA	0.00%							
394	2001	2,966.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%					
394	2002	23,182.00	0.00	0.00	0.00	0.00%	0.00%	0.00%		0.00%					
394	2003	11,760.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
394	2004	34,727.00	3,334.98	0.00	3,334.98	9.60%	7.17%	4.79%	4.59%	4.59%	4.59%	2.21%			
394	2005	18,972.00	11,310.62	0.00	11,310.62	59.62%	27.27%	22.37%	16.52%	15.99%	15.99%	15.99%	8.62%		
394	2006	122,944.00	6,053.00	0.00	6,053.00	4.92%	12.24%	11.72%	10.99%	9.78%	9.65%	9.65%	9.65%	7.07%	
394	2007	0.00	77,411.80	0.00	77,411.80	NA	67.89%	66.78%	55.54%	52.07%	46.37%	45.73%	45.73%	45.73%	33.51%
394	2008	604,926.00	3,381.00	0.00	3,381.00	0.56%	13.36%	11.93%	13.14%	12.99%	12.79%	12.43%	12.38%	12.38%	12.38%
394	2009	0.00	0.00	0.00	0.00	NA	0.56%	13.36%	11.93%	13.14%	12.99%	12.79%	12.43%	12.38%	12.38%
394	2010	0.00	0.00	0.00	0.00	NA	NA	0.56%	13.36%	11.93%	13.14%	12.99%	12.79%	12.43%	12.38%
394	2011	0.00	0.00	16,560.80	(16,560.80)	NA	NA	NA	-2.18%	10.62%	9.66%	10.93%	10.87%	10.71%	10.40%
394	2012	0.00	0.00	17,919.59	(17,919.59)	NA	NA	NA	NA	-5.14%	7.66%	7.19%	8.53%	8.57%	8.45%
394	2013	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	-5.14%	7.66%	7.19%	8.53%	8.57%
394	2014	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	-5.14%	7.66%	7.19%	8.53%
394	2015	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	-5.14%	7.66%	7.19%
394	2016	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	NA	NA	-5.14%	7.66%
394	2017	2,385,352.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	-0.75%	-1.45%	-1.45%	-1.45%	-1.04%
394	2018	2,340,818.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-0.38%	-0.73%	-0.73%	-0.73%
394	2019	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-0.38%	-0.73%	-0.73%
394	2020	299,855.72	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-0.36%	-0.69%
Laboratory Equipment															
395	2006	0.00	0.00	0.00	0.00	NA									
395	2007	23,058.00	0.00	0.00	0.00	0.00%	0.00%								
395	2008	16,792.00	0.00	0.00	0.00	0.00%	0.00%	NA							
395	2009	2,814.00	0.00	0.00	0.00	0.00%	0.00%	NA	NA						
395	2010	0.00	0.00	0.00	0.00	NA	0.00%	NA	NA	NA					
395	2011	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%	0.00%	0.00%				
395	2012	0.00	0.00	0.00	0.00	NA	NA	NA	NA	0.00%	0.00%	0.00%			
395	2013	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%		
395	2014	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	
395	2015	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0
395	2016	0.00	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA	0.00%	0.00%	0.00%	0.00%
395	2017	399,536.69	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
395	2018	1,730.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
395	2019	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
395	2020	0.00	0.00	0.00	0.00	NA	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

PSCO DEPRECIATION STUDY AS OF DECEMBER 31, 2020
COMMON GENERAL PLANT
RETIREMENTS, GROSS SALVAGE, AND REMOVAL COST ANALYSIS

FERC	Activity Year	Retirements	Salvage	Removal Cost	Net Salvage	Net Salv. %	2- yr Net Salv. %	3- yr Net Salv. %	4- yr Net Salv. %	5- yr Net Salv. %	6- yr Net Salv. %	7- yr Net Salv. %	8- yr Net Salv. %	9- yr Net Salv. %	10- yr Net Salv. %
Communication Equipment															
397	1998	724,305.00	0.00	0.00	0.00	0.00%									
397	1999	6,433,188.00	0.00	0.00	0.00	0.00%	0.00%								
397	2000	0.00	0.00	0.00	0.00	NA	0.00%	0.00%							
397	2001	277,218.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%						
397	2002	625,868.00	0.00	0.00	0.00	0.00%	0.00%	0.00%		0.00%					
397	2003	549,049.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
397	2004	921,634.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
397	2005	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
397	2006	4,354,403.16	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
397	2007	2,230,630.13	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
397	2008	1,573,117.00	0.00	1,000.65	(1,000.65)	-0.06%	-0.03%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%
397	2009	4,213,728.00	0.00	0.00	0.00	0.00%	-0.02%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%
397	2010	0.00	0.00	0.00	0.00	NA	0.00%	-0.02%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%	-0.01%
397	2011	8,480,670.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	-0.01%	-0.01%	0.00%	0.00%	0.00%	0.00%	0.00%
397	2012	6,151,270.90	0.00	4,086.69	(4,086.69)	-0.07%	-0.03%	-0.03%	-0.02%	-0.02%	-0.02%	-0.02%	-0.02%	-0.02%	-0.02%
397	2013	16,670,726.48	0.00	8,726.89	(8,726.89)	-0.05%	-0.06%	-0.04%	-0.04%	-0.04%	-0.04%	-0.04%	-0.03%	-0.03%	-0.03%
397	2014	0.00	0.00	0.00	0.00	NA	-0.05%	-0.06%	-0.04%	-0.04%	-0.04%	-0.04%	-0.04%	-0.03%	-0.03%
397	2015	7,972,479.21	0.00	500.35	(500.35)	-0.01%	-0.01%	-0.04%	-0.04%	-0.03%	-0.03%	-0.03%	-0.03%	-0.03%	-0.03%
397	2016	3,582,441.07	0.00	0.00	0.00	0.00%	0.00%	0.00%	-0.03%	-0.04%	-0.03%	-0.03%	-0.03%	-0.03%	-0.03%
397	2017	12,962.68	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	-0.03%	-0.04%	-0.03%	-0.03%	-0.03%	-0.03%
397	2018	9,407,228.09	0.00	24,858.07	(24,858.07)	-0.26%	-0.26%	-0.19%	-0.12%	-0.12%	-0.09%	-0.09%	-0.07%	-0.07%	-0.07%
397	2019	0.00	0.00	0.00	0.00	NA	-0.26%	-0.26%	-0.19%	-0.12%	-0.09%	-0.09%	-0.09%	-0.07%	-0.07%
397	2020	20,614.64	(746.70)	0.00	(746.70)	-3.62%	-3.62%	-0.27%	-0.27%	-0.20%	-0.12%	-0.12%	-0.09%	-0.09%	-0.07%
Miscellaneous Equipment															
398	1998	49,467.00	0.00	0.00	0.00	0.00%									
398	1999	0.00	0.00	0.00	0.00	NA	0.00%								
398	2000	0.00	0.00	0.00	0.00	NA	NA	0.00%							
398	2001	14,365.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%						
398	2002	7,919.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%					
398	2003	2,220.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
398	2004	20,083.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
398	2005	4,321.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
398	2006	304,317.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
398	2007	13,776.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
398	2008	400.00	0.00	800.52	(800.52)	-200.13%	-5.65%	-0.25%	-0.25%	-0.23%	-0.23%	-0.23%	-0.22%	-0.22%	-0.22%
398	2009	0.00	0.00	0.00	0.00	NA	-200.13%	-5.65%	-0.25%	-0.25%	-0.23%	-0.23%	-0.23%	-0.22%	-0.22%
398	2010	0.00	0.00	500.25	(500.25)	NA	NA	-325.19%	-9.18%	-0.41%	-0.40%	-0.38%	-0.38%	-0.37%	-0.35%
398	2011	2,584.25	0.00	0.00	0.00	0.00%	-19.36%	-19.36%	-43.59%	-7.76%	-0.41%	-0.40%	-0.38%	-0.37%	-0.37%
398	2012	0.00	0.00	3,852.48	(3,852.48)	NA	-149.08%	-168.43%	-168.43%	-172.68%	-30.75%	-1.60%	-1.58%	-1.49%	-1.48%
398	2013	1,024.00	0.00	250.43	(250.43)	-24.46%	-400.67%	-113.71%	-127.57%	-127.57%	-134.81%	-30.38%	-1.68%	-1.66%	-1.56%
398	2014	55,284.00	0.00	0.00	0.00	0.00%	-0.44%	-7.29%	-6.97%	-7.82%	-7.82%	-9.11%	-7.40%	-1.43%	-1.42%
398	2015	119,456.00	0.00	0.00	0.00	0.00%	0.00%	-0.14%	-2.33%	-2.30%	-2.58%	-2.58%	-3.02%	-2.81%	-1.09%
398	2016	54,063.88	0.00	0.00	0.00	0.00%	0.00%	0.00%	-0.11%	-1.79%	-1.77%	-1.98%	-1.98%	-2.32%	-2.19%
398	2017	23,377.00	0.00	0.00	0.00	0.00%	0.00%	0.00%	0.00%	-0.10%	-1.62%	-1.60%	-1.80%	-1.80%	-2.11%
398	2018	0.00	0.00	0.00	0.00	NA	0.00%	0.00%	0.00%	0.00%	-0.10%	-1.62%	-1.60%	-1.80%	-1.80%
398	2019	0.00	0.00	0.00	0.00	NA	NA	0.00%	0.00%	0.00%	0.00%	-0.10%	-1.62%	-1.60%	-1.80%
398	2020	0.00	0.00	0.00	0.00	NA	NA	NA	0.00%	0.00%	0.00%	0.00%	-0.10%	-1.62%	-1.60%

PUBLIC SERVICE OF COLORADO
FLEET PROCEEDS 2014-2020 Electric and Common

Year	Account	Original Cost	Sales Proceeds	Salvage %
2014	392010	116,278.18	14,940.00	12.85%
2015	392010	61,640.00	4,536.00	7.36%
2016	392010	51,698.00	4,645.00	8.98%
2017	392010	177,594.25	25,316.00	14.25%
2018	392010	529,034.00	46,948.01	8.87%
2019	392010	235,404.75	24,234.01	10.29%
2020	392010	132,319.52	14,781.00	11.17%
Total	392010	1,303,968.70	135,400.02	10.38%
2014	392020	293,173.57	25,677.00	8.76%
2015	392020	1,048,199.35	80,299.01	7.66%
2016	392020	1,400,965.66	154,735.51	11.04%
2017	392020	418,879.30	34,980.50	8.35%
2018	392020	812,317.19	99,842.35	12.29%
2019	392020	882,565.30	138,690.00	15.71%
2020	392020	1,424,874.06	188,055.00	13.20%
Total	392020	6,280,974.43	722,279.37	11.50%
2014	392030	37,470.00	6,091.00	16.26%
2015	392030	99,884.00	37,835.00	37.88%
2016	392030	146,199.00	21,826.69	14.93%
2017	392030	67,892.00	2,506.01	3.69%
2018	392030	137,829.95	23,663.00	17.17%
2019	392030	41,653.43	6,640.52	15.94%
2020	392030	352,266.01	88,838.97	25.22%
Total	392030	883,194.39	187,401.19	21.22%

PUBLIC SERVICE OF COLORADO
FLEET PROCEEDS 2014-2020 Electric and Common

Year	Account	Original Cost	Sales Proceeds	Salvage %
2014	392040	1,770,341.34	162,976.00	9.21%
2015	392040	2,368,181.99	236,678.00	9.99%
2016	392040	2,149,949.04	251,463.00	11.70%
2017	392040	2,143,200.27	187,250.00	8.74%
2018	392040	2,407,973.67	345,745.00	14.36%
2019	392040	1,757,610.64	175,020.00	9.96%
2020	392040	4,068,685.60	329,225.00	8.09%
Total		16,665,942.55	1,688,357.00	10.13%
2014	396000	149,057.76	86,060.00	57.74%
2015	396000	82,230.70	54,940.00	66.81%
2016	396000	286,930.76	67,360.18	23.48%
2017	396000	0.00	0.00	
2018	396000	414,976.84	162,308.00	39.11%
2019	396000	292,059.12	62,330.00	21.34%
2020	396000	1,020,938.73	371,736.00	36.41%
Total		2,246,193.91	804,734.18	35.83%

APPENDIX F
Production Composite Net Salvage

Public Service of Colorado
Comparison of Plant,, Book Depreciation Reserve, and Reallocated Reserve
At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020 (1)	Per Books Total Reserve Balance 12/31/2020 (2)	Reallocated Total Reserve Balance 12/31/2020 (3)	Difference (4)
<u>ELECTRIC INTANGIBLE</u>					
301.00	Organization Costs				
302.00	Franchises and Consents	17,129,579	6,444,663	6,444,663	0
303.00	Miscellaneous Intangible Plant	12,615,042	8,005,133	8,005,133	0
303.03	Misc Computer Software - 3 Year	0	0	0	0
303.07	Misc Computer Software - 7 Year	74,885,913	44,210,053	44,210,053	0
303.10	Misc Computer Software - 10 Year	67,176,579	7,594,262	7,594,262	0
303.15	Misc Computer Software - 15 Year	0	0	0	0
	Total Electric Intangible Plant	171,807,113	66,254,111	66,254,111	0
<u>STEAM PRODUCTION</u>					
Cameo Common	310.2 Land Rights	1,392	1,226	1,392	166
Cherokee Unit 2 SC	314 Turbogenerator Units	1,822,036	1,377,672	1,193,457	(184,216)
Cherokee Unit 2 SC	315 Accessory Electric Equipment	2,060,951	1,368,940	1,423,670	54,730
Cherokee Unit 2 SC	Total	3,882,987	2,746,613	2,617,127	(129,486)
Cherokee Unit 4	311 Structures and Improvements	11,176,565	7,421,565	9,087,467	1,665,902
Cherokee Unit 4	312 Boiler Plant Equipment	41,421,999	34,927,797	32,716,691	(2,211,106)
Cherokee Unit 4	312 Boiler Plant Equipment AQIR	2,094,832	5,072,627	1,539,040	(3,533,587)
Cherokee Unit 4	314 Turbogenerator Units	26,921,788	15,867,397	21,069,556	5,202,159
Cherokee Unit 4	315 Accessory Electric Equipment	8,681,064	6,138,523	7,262,345	1,123,822
Cherokee Unit 4	315.2 Computers and Peripherals	3,233,582	2,348,536	2,988,770	640,233
Cherokee Unit 4	316 Miscellaneous Power Plant Equipment	548,747	312,792	332,434	19,642
Cherokee Unit 4	Total	94,078,576	72,089,238	74,996,302	2,907,064
Cherokee Common	310.2 Land Rights	12,865,962	8,288,711	9,103,317	814,605
Cherokee Common	310.3 Water Rights	112,245	64,622	70,631	6,009
Cherokee Common	311 Structures and Improvements	43,733,073	25,299,960	29,475,194	4,175,234
Cherokee Common	312 Boiler Plant Equipment	10,756,698	(3,556)	6,878,802	6,882,357
Cherokee Common	312 Boiler Plant Equipment AQIR	2,461,276	8,810,095	1,864,014	(6,946,081)
Cherokee Common	314 Turbogenerator Units	229,286	103,633	185,470	81,837
Cherokee Common	315 Accessory Electric Equipment	9,369,122	6,353,052	7,764,227	1,411,175
Cherokee Common	315.2 Computers and Peripherals	0	(41,268)		41,268
Cherokee Common	316 Miscellaneous Power Plant Equipment	1,654,248	1,540,781	1,251,407	(289,375)
Cherokee Common	Total	81,181,909	50,416,032	56,593,062	6,177,030
Coal Cars	312 Boiler Plant Equipment	20,020,245	8,929,788	9,551,389	621,601
					0

Public Service of Colorado
Comparison of Plant,, Book Depreciation Reserve, and Reallocated Reserve
At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020	Per Books Total Reserve Balance 12/31/2020	Reallocated Total Reserve Balance 12/31/2020	Difference
		(1)	(2)	(3)	(4)
Comanche Unit 1	311 Structures and Improvements	16,633,155	10,849,144	10,849,144	0
Comanche Unit 1	312 Boiler Plant Equipment	216,416,165	119,448,342	119,448,342	0
Comanche Unit 1	314 Turbogenerator Units	40,220,828	20,387,658	20,387,658	0
Comanche Unit 1	315 Accessory Electric Equipment	20,471,436	12,314,198	12,314,198	0
Comanche Unit 1	315.2 Computers and Peripherals	1,407,501	567,331	567,331	0
Comanche Unit 1	316 Miscellaneous Power Plant Equipment	914,298	374,259	374,259	0
Comanche Unit 1	Total	296,063,384	163,940,932	163,940,932	0
Comanche Unit 2	311 Structures and Improvements	8,413,195	5,294,861	5,294,861	0
Comanche Unit 2	312 Boiler Plant Equipment	177,575,948	92,705,581	92,705,581	0
Comanche Unit 2	314 Turbogenerator Units	40,368,504	19,728,169	19,728,169	0
Comanche Unit 2	315 Accessory Electric Equipment	22,984,266	11,518,199	11,518,199	0
Comanche Unit 2	315.2 Computers and Peripherals	0	0	0	0
Comanche Unit 2	316 Miscellaneous Power Plant Equipment	871,236	463,933	463,933	0
Comanche Unit 2	Total	250,213,149	129,710,744	129,710,744	0
Comanche Cm Unit Retire with 1 & 2	311 Structures and Improvements	1,505,849	1,003,604	1,003,604	0
Comanche Cm Unit Retire with 1 & 2	312 Boiler Plant Equipment	14,842,287	6,679,996	6,679,996	0
Comanche Cm Unit Retire with 1 & 2	314 Turbogenerator Units	2,133,205	986,382	986,382	0
Comanche Cm Unit Retire with 1 & 2	315 Accessory Electric Equipment	1,643,329	194,984	194,984	0
Comanche Cm Unit Retire with 1 & 2	315.2 Computers and Peripherals	190,989	52,230	52,230	0
Comanche Cm Unit Retire with 1 & 2	316 Miscellaneous Power Plant Equipment	661,437	(216,098)	(216,098)	0
Comanche Cm Unit Retire with 1 & 2	Total	20,977,095	8,701,098	8,701,098	0
Comanche Unit 3	310.2 Land Rights	8,159	1,561	1,561	0
Comanche Unit 3	311 Structures and Improvements	129,287,485	20,583,253	20,583,253	0
Comanche Unit 3	312 Boiler Plant Equipment	544,630,626	76,580,346	76,580,346	0
Comanche Unit 3	314 Turbogenerator Units	166,669,836	30,170,281	30,170,281	0
Comanche Unit 3	315 Accessory Electric Equipment	90,629,149	14,509,807	14,509,807	0
Comanche Unit 3	315.2 Computers and Peripherals	0	0	0	0
Comanche Unit 3	316 Miscellaneous Power Plant Equipment	19,398,331	3,512,761	3,512,761	0
Comanche Unit 3	Total	950,623,587	145,358,010	145,358,010	0
Comanche Cm Retire with Unit 3	311 Structures and Improvements	31,692,101	14,671,592	14,671,592	0
Comanche Cm Retire with Unit 3	312 Boiler Plant Equipment	18,715,540	4,203,214	4,203,214	0
Comanche Cm Retire with Unit 3	314 Turbogenerator Units	178,872	59,098	59,098	0
Comanche Cm Retire with Unit 3	315 Accessory Electric Equipment	2,434,794	873,849	873,849	0
Comanche Cm Retire with Unit 3	315.2 Computers and Peripherals	0	0	0	0
Comanche Cm Retire with Unit 3	316 Miscellaneous Power Plant Equipment	1,892,038	691,868	691,868	0
Comanche Cm Retire with Unit 3	Total	54,913,345	20,499,620	20,499,620	0

Public Service of Colorado
Comparison of Plant,, Book Depreciation Reserve, and Reallocated Reserve
At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020	Per Books Total Reserve Balance 12/31/2020	Reallocated Total Reserve Balance 12/31/2020	Difference
		(1)	(2)	(3)	(4)
Craig Unit 1	311 Structures and Improvements	6,681,129	5,488,154	5,488,154	0
Craig Unit 1	312 Boiler Plant Equipment	18,516,678	15,378,991	15,378,991	0
Craig Unit 1	314 Turbogenerator Units	2,342,209	1,367,822	1,367,822	0
Craig Unit 1	315 Accessory Electric Equipment	2,901,979	2,320,811	2,320,811	0
Craig Unit 1	315.2 Computers and Peripherals	0	0	0	0
Craig Unit 1	316 Miscellaneous Power Plant Equipment	122,465	105,353	105,353	0
Craig Unit 1	Total	30,564,460	24,661,130	24,661,130	0
Craig Unit 2	311 Structures and Improvements	6,571,154	4,003,963	4,097,670	93,706
Craig Unit 2	312 Boiler Plant Equipment	33,300,984	10,135,016	10,982,421	847,406
Craig Unit 2	314 Turbogenerator Units	7,102,887	3,530,345	3,127,137	(403,207)
Craig Unit 2	315 Accessory Electric Equipment	3,564,960	2,164,918	2,160,019	(4,899)
Craig Unit 2	315.2 Computers and Peripherals	0	0	0	0
Craig Unit 2	316 Miscellaneous Power Plant Equipment	139,310	79,194	74,343	(4,851)
Craig Unit 2	Total	50,679,294	19,913,435	20,441,591	528,155
Craig Common	311 Structures and Improvements	7,300,852	4,356,462	4,537,949	181,487
Craig Common	312 Boiler Plant Equipment	23,740,228	15,393,803	12,182,706	(3,211,097)
Craig Common	314 Turbogenerator Units	3,300,265	1,864,708	1,800,250	(64,458)
Craig Common	315 Accessory Electric Equipment	2,111,220	1,236,845	1,289,963	53,117
Craig Common	315.2 Computers and Peripherals	319,851	130,799	297,845	167,046
Craig Common	316 Miscellaneous Power Plant Equipment	2,006,357	933,789	824,580	(109,209)
Craig Common	Total	38,778,773	23,916,406	20,933,293	(2,983,113)
Hayden Unit 1	311 Structures and Improvements	6,751,016	5,090,312	5,644,514	554,203
Hayden Unit 1	312 Boiler Plant Equipment	122,772,414	70,479,548	61,972,105	(8,507,442)
Hayden Unit 1	314 Turbogenerator Units	17,831,841	11,914,733	11,549,281	(365,452)
Hayden Unit 1	315 Accessory Electric Equipment	5,142,587	3,633,272	3,890,844	257,572
Hayden Unit 1	315.2 Computers and Peripherals	1,135,642	547,448	982,833	435,385
Hayden Unit 1	316 Miscellaneous Power Plant Equipment	257,721	155,027	163,839	8,812
Hayden Unit 1	Total	153,891,220	91,820,340	84,203,417	(7,616,922)
Hayden Unit 2	311 Structures and Improvements	27,926,499	18,189,046	13,468,445	(4,720,601)
Hayden Unit 2	312 Boiler Plant Equipment	99,358,411	42,160,444	43,829,941	1,669,497
Hayden Unit 2	314 Turbogenerator Units	15,131,935	8,252,539	8,404,043	151,504
Hayden Unit 2	315 Accessory Electric Equipment	6,993,246	4,014,496	4,347,259	332,763
Hayden Unit 2	315.2 Computers and Peripherals	975,875	344,433	658,110	313,678
Hayden Unit 2	316 Miscellaneous Power Plant Equipment	1,165,183	325,021	360,289	35,268
Hayden Unit 2	Total	151,551,148	73,285,979	71,068,088	(2,217,891)

Public Service of Colorado
Comparison of Plant,, Book Depreciation Reserve, and Reallocated Reserve
At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020	Per Books Total Reserve Balance 12/31/2020	Reallocated Total Reserve Balance 12/31/2020	Difference
		(1)	(2)	(3)	(4)
Hayden Common	311 Structures and Improvements	7,904,667	3,268,371	3,494,931	226,560
Hayden Common	312 Boiler Plant Equipment	29,313,231	19,912,979	19,446,970	(466,010)
Hayden Common	314 Turbogenerator Units	1,590,973	961,287	915,886	(45,401)
Hayden Common	315 Accessory Electric Equipment	299,321	144,191	164,399	20,207
Hayden Common	315.2 Computers and Peripherals	0	0	0	0
Hayden Common	316 Miscellaneous Power Plant Equipment	1,970,611	856,256	837,041	(19,215)
Hayden Common	Total	41,078,804	25,143,085	24,859,226	(283,858)
Pawnee Unit 1	311 Structures and Improvements	141,874,484	79,615,241	87,759,324	8,144,083
Pawnee Unit 1	312 Boiler Plant Equipment	567,806,245	209,973,172	190,283,175	(19,689,997)
Pawnee Unit 1	314 Turbogenerator Units	75,873,783	29,634,293	34,045,784	4,411,491
Pawnee Unit 1	315 Accessory Electric Equipment	61,689,230	32,898,614	35,878,769	2,980,155
Pawnee Unit 1	315.2 Computers and Peripherals	8,163,408	3,147,538	6,699,052	3,551,514
Pawnee Unit 1	316 Miscellaneous Power Plant Equipment	6,182,794	3,158,781	3,280,327	121,545
Pawnee Unit 1	Total	861,589,944	358,427,639	357,946,430	(481,209)
Pawnee Common	311 Structures and Improvements	20,560,345	5,418,235	8,155,110	2,736,875
Pawnee Common	312 Boiler Plant Equipment	25,954,446	18,415,700	19,224,340	808,640
Pawnee Common	314 Turbogenerator Units	309,543	235,063	254,478	19,414
Pawnee Common	315 Accessory Electric Equipment	938,730	845,515	398,830	(446,685)
Pawnee Common	315.2 Computers and Peripherals	465,779	139,163	394,604	255,440
Pawnee Common	316 Miscellaneous Power Plant Equipment	2,950,489	2,078,992	2,205,096	126,104
Pawnee Common	Total	51,179,333	27,132,669	30,632,457	3,499,788
Zuni Common	310.3 Water Rights	586,847	608,173	586,847	(21,326)
	Total Steam Production	3,151,855,493	1,247,302,155	1,247,302,155	0

HYDRAULIC PRODUCTION

Ames	331 Structures and Improvements	399,964	65,433	90,914	25,482
Ames	332 Reservoirs, Dams and Waterways	9,790,217	2,667,211	2,773,978	106,766
Ames	333 Waterwheels, Turbines and Generators	156,202	61,957	82,554	20,596
Ames	334 Accessory Electric Equipment	1,760,800	633,943	653,351	19,408
Ames	334.2 Computers and Peripherals	0	0		0
Ames	335 Misc. Power Plant Equipment	102,063	36,352	40,660	4,309
Ames	335.2 Recreational Facilities	168,012	61,116	67,805	6,689
Ames	336 Roads, Railroads and Bridges	21,231	7,021	7,745	724
Ames	Total	12,398,488	3,533,034	3,717,007	183,973

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At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020	Per Books Total Reserve Balance 12/31/2020	Reallocated Total Reserve Balance 12/31/2020	Difference
		(1)	(2)	(3)	(4)
Cabin Creek	331 Structures and Improvements	20,153,917	6,573,640	6,810,080	236,440
Cabin Creek	332 Reservoirs, Dams and Waterways	21,375,865	11,631,184	13,316,799	1,685,615
Cabin Creek	333 Waterwheels, Turbines and Generators	19,676,896	9,364,039	9,882,074	518,035
Cabin Creek	334 Accessory Electric Equipment	4,738,508	2,267,606	2,182,333	(85,273)
Cabin Creek	334.2 Computers and Peripherals	56,206	28,600	56,206	27,606
Cabin Creek	335 Misc. Power Plant Equipment	696,051	298,015	292,504	(5,511)
Cabin Creek	335.2 Recreational Facilities	3,927	1,902	1,815	(87)
Cabin Creek	336 Roads, Railroads and Bridges	453,762	241,474	282,441	40,967
Cabin Creek	Total	67,155,131	30,406,460	32,824,252	2,417,792
Georgetown	331 Structures and Improvements	147,604	119,868	65,423	(54,445)
Georgetown	332 Reservoirs, Dams and Waterways	20,294,802	5,175,872	4,584,380	(591,491)
Georgetown	333 Waterwheels, Turbines and Generators	384,215	62,228	38,495	(23,733)
Georgetown	334 Accessory Electric Equipment	522,378	400,796	217,870	(182,926)
Georgetown	334.2 Computers and Peripherals	0	0	0	0
Georgetown	335 Misc. Power Plant Equipment	1,317	956	694	(262)
Georgetown	335.2 Recreational Facilities	240,335	181,514	105,213	(76,301)
Georgetown	336 Roads, Railroads and Bridges	0	0	0	0
Georgetown	Total	21,590,651	5,941,234	5,012,075	(929,158)
Salida	331 Structures and Improvements	82,936	142,870	130,485	(12,386)
Salida	332 Reservoirs, Dams and Waterways	2,704,463	3,569,861	3,656,629	86,768
Salida	333 Waterwheels, Turbines and Generators	24,873	98,735	47,384	(51,351)
Salida	334 Accessory Electric Equipment	273,607	460,128	428,411	(31,717)
Salida	334.2 Computers and Peripherals	0	0	0	0
Salida	335 Misc. Power Plant Equipment	1,900	3,424	3,565	141
Salida	335.2 Recreational Facilities	151,492	218,329	238,424	20,094
Salida	336 Roads, Railroads and Bridges	20,450	31,788	33,275	1,487
Salida	Total	3,259,721	4,525,135	4,538,173	13,037
Shoshone	331 Structures and Improvements	4,215,418	819,938	577,922	(242,015)
Shoshone	332 Reservoirs, Dams and Waterways	16,859,400	4,517,329	3,454,035	(1,063,295)
Shoshone	333 Waterwheels, Turbines and Generators	3,668,464	953,685	724,118	(229,567)
Shoshone	334 Accessory Electric Equipment	3,331,273	857,538	640,346	(217,192)
Shoshone	334.2 Computers and Peripherals	0	0	0	0
Shoshone	335 Misc. Power Plant Equipment	878,735	267,346	181,963	(85,382)
Shoshone	335.2 Recreational Facilities	0	0	0	0
Shoshone	336 Roads, Railroads and Bridges	9,247	3,660	3,880	220
Shoshone	Total	28,962,536	7,419,496	5,582,265	(1,837,232)

Public Service of Colorado
Comparison of Plant,, Book Depreciation Reserve, and Reallocated Reserve
At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020	Per Books Total Reserve Balance 12/31/2020	Reallocated Total Reserve Balance 12/31/2020	Difference
		(1)	(2)	(3)	(4)
Tacoma	331 Structures and Improvements	310,681	85,396	86,425	1,028
Tacoma	332 Reservoirs, Dams and Waterways	17,318,247	3,074,886	2,639,592	(435,294)
Tacoma	333 Waterwheels, Turbines and Generators	1,214,415	(528,616)	425,338	953,954
Tacoma	334 Accessory Electric Equipment	2,876,031	989,947	716,187	(273,760)
Tacoma	334.2 Computers and Peripherals	0	0	0	0
Tacoma	335 Misc. Power Plant Equipment	213,111	105,372	80,388	(24,984)
Tacoma	335.2 Recreational Facilities	478,920	252,760	206,133	(46,627)
Tacoma	336 Roads, Railroads and Bridges	270,175	151,877	129,147	(22,730)
Tacoma	Total	22,681,580	4,131,622	4,283,210	151,588
	Total Hydraulic Production	156,048,107	55,956,982	55,956,982	0
<u>OTHER PRODUCTION</u>					
Alamosa	341 Structures and Improvements	526,020	492,768	411,604	(81,164)
Alamosa	342 Fuel Holders, Producers, and Accessories	331,421	343,149	314,579	(28,570)
Alamosa	343 Prime Movers	0	0	0	0
Alamosa	344 Generators	7,625,547	7,253,530	6,868,041	(385,489)
Alamosa	345 Accessory Electric Equipment	994,564	696,209	619,480	(76,729)
Alamosa	345.2 Computers and Peripherals	0	0	0	0
Alamosa	346 Miscellaneous Power Plant Equipment	296,893	147,732	166,503	18,771
Alamosa	Total	9,774,446	8,933,388	8,380,207	(553,180)
Blue Spruce	341 Structures and Improvements	0	0	0	0
Blue Spruce	342 Fuel Holders, Producers, and Accessories	0	0	0	0
Blue Spruce	343 Prime Movers	0	0	0	0
Blue Spruce	344 Generators	218,253,183	56,193,231	55,721,611	(471,620)
Blue Spruce	345 Accessory Electric Equipment	923,556	163,796	138,601	(25,195)
Blue Spruce	345.2 Computers and Peripherals	0	0	0	0
Blue Spruce	346 Miscellaneous Power Plant Equipment	0	0	0	0
Blue Spruce	Total	219,176,738	56,357,027	55,860,213	(496,814)
Cherokee 5-7	341 Structures and Improvements	126,064,022	18,196,131	18,094,957	(101,174)
Cherokee 5-7	342 Fuel Holders, Producers, and Accessories	5,680,939	856,658	818,754	(37,904)
Cherokee 5-7	343 Prime Movers	131,493,260	19,691,469	17,661,363	(2,030,107)
Cherokee 5-7	344 Generators	244,245,248	22,121,971	31,644,727	9,522,756
Cherokee 5-7	345 Accessory Electric Equipment	63,675,645	9,377,324	9,196,451	(180,873)
Cherokee 5-7	345.2 Computers and Peripherals	0	0	0	0
Cherokee 5-7	346 Miscellaneous Power Plant Equipment	27,526,672	3,803,221	5,327,064	1,523,843
Cherokee 5-7	Total	598,685,786	74,046,774	82,743,315	8,696,541

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At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020	Per Books Total Reserve Balance 12/31/2020	Reallocated Total Reserve Balance 12/31/2020	Difference
		(1)	(2)	(3)	(4)
Fruita	340 Land Rights	452	434	406	(28)
Fruita	341 Structures and Improvements	92,014	94,178	87,208	(6,969)
Fruita	342 Fuel Holders, Producers, and Accessories	599,152	559,995	490,012	(69,983)
Fruita	343 Prime Movers	0	0	0	0
Fruita	344 Generators	2,512,252	2,551,135	2,305,142	(245,993)
Fruita	345 Accessory Electric Equipment	74,773	71,843	56,527	(15,316)
Fruita	345.2 Computers and Peripherals	0	0	0	0
Fruita	346 Miscellaneous Power Plant Equipment	200,385	109,629	119,844	10,215
Fruita	Total	3,479,028	3,387,214	3,059,140	(328,074)
Ft Saint Vrain Unit 1	341 Structures and Improvements	22,903,499	14,830,542	15,312,798	482,256
Ft Saint Vrain Unit 1	342 Fuel Holders, Producers, and Accessories	3,664,793	2,423,234	2,008,930	(414,304)
Ft Saint Vrain Unit 1	343 Prime Movers	4,065,900	493,779	496,803	3,024
Ft Saint Vrain Unit 1	344 Generators	78,003,472	42,745,624	40,729,406	(2,016,217)
Ft Saint Vrain Unit 1	345 Accessory Electric Equipment	21,305,835	11,692,197	10,611,202	(1,080,996)
Ft Saint Vrain Unit 1	345.2 Computers and Peripherals	95,966	58,540	95,966	37,426
Ft Saint Vrain Unit 1	346 Miscellaneous Power Plant Equipment	3,788,835	2,489,727	3,229,880	740,153
Ft Saint Vrain Unit 1	Total	133,828,301	74,733,643	72,484,985	(2,248,658)
Ft Saint Vrain Unit 2	341 Structures and Improvements	30,833	3,965	4,005	40
Ft Saint Vrain Unit 2	342 Fuel Holders, Producers, and Accessories	594,312	98,550	149,964	51,414
Ft Saint Vrain Unit 2	343 Prime Movers	2,779,822	701,740	637,817	(63,923)
Ft Saint Vrain Unit 2	344 Generators	86,584,175	42,960,183	39,413,816	(3,546,367)
Ft Saint Vrain Unit 2	345 Accessory Electric Equipment	1,968,283	275,330	488,500	213,170
Ft Saint Vrain Unit 2	345.2 Computers and Peripherals	1,818,121	159,755	1,366,574	1,206,819
Ft Saint Vrain Unit 2	346 Miscellaneous Power Plant Equipment	538,315	(29,961)	113,268	143,229
Ft Saint Vrain Unit 2	Total	94,313,861	44,169,561	42,173,943	(1,995,617)
Ft Saint Vrain Unit 3	341 Structures and Improvements	0	0	0	0
Ft Saint Vrain Unit 3	342 Fuel Holders, Producers, and Accessories	659,565	71,562	148,379	76,817
Ft Saint Vrain Unit 3	343 Prime Movers	4,759,486	1,871,388	1,291,712	(579,676)
Ft Saint Vrain Unit 3	344 Generators	28,404,319	4,837,458	5,570,286	732,828
Ft Saint Vrain Unit 3	345 Accessory Electric Equipment	633,752	207,630	190,424	(17,206)
Ft Saint Vrain Unit 3	345.2 Computers and Peripherals	0	0	0	0
Ft Saint Vrain Unit 3	346 Miscellaneous Power Plant Equipment	44,486	(83,818)	5,583	89,402
Ft Saint Vrain Unit 3	Total	34,501,608	6,904,220	7,206,385	302,165

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Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020	Per Books Total Reserve Balance 12/31/2020	Reallocated Total Reserve Balance 12/31/2020	Difference
		(1)	(2)	(3)	(4)
Ft Saint Vrain Unit 4	341 Structures and Improvements	3,062,941	2,137,038	1,995,271	(141,767)
Ft Saint Vrain Unit 4	342 Fuel Holders, Producers, and Accessories	27,606,186	14,813,934	13,658,266	(1,155,667)
Ft Saint Vrain Unit 4	343 Prime Movers	2,761,168	245,692	319,471	73,780
Ft Saint Vrain Unit 4	344 Generators	93,927,607	36,363,891	33,826,988	(2,536,903)
Ft Saint Vrain Unit 4	345 Accessory Electric Equipment	7,848,198	3,770,133	3,650,341	(119,791)
Ft Saint Vrain Unit 4	345.2 Computers and Peripherals	0	0	0	0
Ft Saint Vrain Unit 4	346 Miscellaneous Power Plant Equipment	17,384	9,293	10,251	959
Ft Saint Vrain Unit 4	Total	135,223,484	57,339,980	53,460,590	(3,879,390)
Ft Saint Vrain Unit 5	341 Structures and Improvements	7,455,783	2,259,695	2,186,366	(73,329)
Ft Saint Vrain Unit 5	342 Fuel Holders, Producers, and Accessories	2,200,775	701,527	648,343	(53,184)
Ft Saint Vrain Unit 5	343 Prime Movers	1,327,090	251,709	184,423	(67,286)
Ft Saint Vrain Unit 5	344 Generators	59,827,684	17,637,152	16,797,775	(839,377)
Ft Saint Vrain Unit 5	345 Accessory Electric Equipment	12,563,319	3,766,344	3,625,448	(140,896)
Ft Saint Vrain Unit 5	345.2 Computers and Peripherals	0	0	0	0
Ft Saint Vrain Unit 5	346 Miscellaneous Power Plant Equipment	644,763	193,192	227,578	34,386
Ft Saint Vrain Unit 5	Total	84,019,415	24,809,617	23,669,932	(1,139,686)
Ft Saint Vrain Unit 6	341 Structures and Improvements	7,364,719	2,237,814	2,160,749	(77,065)
Ft Saint Vrain Unit 6	342 Fuel Holders, Producers, and Accessories	2,477,944	790,230	729,998	(60,232)
Ft Saint Vrain Unit 6	343 Prime Movers	1,327,207	253,668	185,607	(68,060)
Ft Saint Vrain Unit 6	344 Generators	62,860,470	18,945,857	17,223,868	(1,721,989)
Ft Saint Vrain Unit 6	345 Accessory Electric Equipment	9,197,849	2,854,158	2,697,691	(156,467)
Ft Saint Vrain Unit 6	345.2 Computers and Peripherals	0	0	0	0
Ft Saint Vrain Unit 6	346 Miscellaneous Power Plant Equipment	631,726	193,207	234,251	41,044
Ft Saint Vrain Unit 6	Total	83,859,913	25,274,933	23,232,164	(2,042,769)
Ft Saint Vrain Common	341 Structures and Improvements	13,330,432	4,972,746	5,775,647	802,902
Ft Saint Vrain Common	342 Fuel Holders, Producers, and Accessories	1,911,610	1,139,036	995,965	(143,071)
Ft Saint Vrain Common	343 Prime Movers	923,842	330,264	273,180	(57,083)
Ft Saint Vrain Common	344 Generators	43,015,810	27,174,547	22,499,667	(4,674,880)
Ft Saint Vrain Common	345 Accessory Electric Equipment	17,395,546	7,674,608	7,270,257	(404,351)
Ft Saint Vrain Common	345.2 Computers and Peripherals	403,578	(828,500)	214,674	1,043,174
Ft Saint Vrain Common	346 Miscellaneous Power Plant Equipment	1,753,887	383,707	485,998	102,291
Ft Saint Vrain Common	Total	78,734,705	40,846,407	37,515,389	(3,331,018)
Ft. Lupton CT	341 Structures and Improvements	191,963	177,574	168,660	(8,914)
Ft. Lupton CT	342 Fuel Holders, Producers, and Accessories	350,190	309,555	301,548	(8,007)
Ft. Lupton CT	343 Prime Movers	0	0	0	0
Ft. Lupton CT	344 Generators	12,539,804	11,131,257	10,439,719	(691,539)
Ft. Lupton CT	345 Accessory Electric Equipment	682,730	414,948	428,975	14,027
Ft. Lupton CT	345.2 Computers and Peripherals	0	0	0	0
Ft. Lupton CT	346 Miscellaneous Power Plant Equipment	4,773	4,153	3,408	(745)
Ft. Lupton CT	Total	13,769,460	12,037,487	11,342,309	(695,178)

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		(1)	(2)	(3)	(4)
Rocky Mountain	341 Structures and Improvements	8,956,582	(147,921)	1,388,513	1,536,434
Rocky Mountain	342 Fuel Holders, Producers, and Accessories	2,279,742	(421,821)	333,604	755,425
Rocky Mountain	343 Prime Movers	7,982,369	828,498	845,434	16,937
Rocky Mountain	344 Generators	408,620,837	93,020,064	101,567,164	8,547,100
Rocky Mountain	345 Accessory Electric Equipment	2,119,562	267,516	480,791	213,276
Rocky Mountain	345.2 Computers and Peripherals	0	0	0	0
Rocky Mountain	346 Miscellaneous Power Plant Equipment	774,543	74,019	92,168	18,149
Rocky Mountain	Total	430,733,634	93,620,355	104,707,675	11,087,320
Valmont 6	341 Structures and Improvements	15,622,333	9,785,537	11,513,145	1,727,608
Valmont 6	342 Fuel Holders, Producers, and Accessories	1,161,386	644,277	959,842	315,565
Valmont 6	343 Prime Movers	0	0	0	0
Valmont 6	344 Generators	9,251,296	7,544,249	6,805,130	(739,119)
Valmont 6	345 Accessory Electric Equipment	2,133,217	1,288,932	1,466,630	177,698
Valmont 6	345.2 Computers and Peripherals	0	0	0	0
Valmont 6	346 Miscellaneous Power Plant Equipment	82,117	84,486	71,920	(12,566)
Valmont 6	Total	28,250,349	19,347,480	20,816,666	1,469,187
Valmont 7 & 8	341 Structures and Improvements	3,429,684	229,550	105,336	(124,215)
Valmont 7 & 8	342 Fuel Holders, Producers, and Accessories	1,347,748	2,599,870	40,689	(2,559,181)
Valmont 7 & 8	343 Prime Movers	0	0	0	0
Valmont 7 & 8	344 Generators	6,923,940	3,130,296	219,729	(2,910,567)
Valmont 7 & 8	345 Accessory Electric Equipment	7,940,596	2,780,119	387,281	(2,392,837)
Valmont 7 & 8	345.2 Computers and Peripherals	0	0	0	0
Valmont 7 & 8	346 Miscellaneous Power Plant Equipment	162,661	58,366	5,632	(52,734)
Valmont 7 & 8	Total	19,804,631	8,798,201	758,667	(8,039,534)
Wind to Hydrogen	344 Generators	1,017,482	870,102	964,248	94,146
	Total Other Production	1,969,172,841	551,476,388	548,375,827	(3,100,561)

WIND PRODUCTION

Cheyenne Ridge WF	340 Land Rights	0	0	0	0
Cheyenne Ridge WF	341 Structures and Improvements	26,510,642	430,326	430,326	0
Cheyenne Ridge WF	342 Fuel Holders, Producers, and Accessories	0	0	0	0
Cheyenne Ridge WF	344 Generators	589,177,653	9,563,640	9,563,640	0
Cheyenne Ridge WF	345 Accessory Electric Equipment	0	0	0	0
Cheyenne Ridge WF	346 Miscellaneous Power Plant Equipment	39,107,591	634,590	634,590	0
Cheyenne Ridge WF	Total	654,795,885	10,628,555	10,628,555	0

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At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020	Per Books Total Reserve Balance 12/31/2020	Reallocated Total Reserve Balance 12/31/2020	Difference
		(1)	(2)	(3)	(4)
Ponnequin Wind	341 Structures and Improvements	0	22,804		(22,804)
Ponnequin Wind	344 Generators	0	753,718	3,898,760	3,145,042
Ponnequin Wind	345 Accessory Electric Equipment	0	21,677		(21,677)
Ponnequin Wind	Total	0	798,199	3,898,760	3,100,561
Rush Creek WF	340 Land Rights	0	0	0	0
Rush Creek WF	341 Structures and Improvements	0	0	0	0
Rush Creek WF	342 Fuel Holders, Producers, and Accessories	0	0	0	0
Rush Creek WF	344 Generators	897,481,357	79,442,536	79,442,536	0
Rush Creek WF	345 Accessory Electric Equipment	18,379	631	631	0
Rush Creek WF	346 Miscellaneous Power Plant Equipment	0	0	0	0
Rush Creek WF	Total	897,499,736	79,443,168	79,443,168	0
Total Wind Production		1,552,295,622	90,869,922	93,970,483	3,100,561
Total Production		6,829,372,062	1,945,605,447	1,945,605,447	(0)

TRANSMISSION

350.2 Land Rights	96,124,140	16,811,202	15,644,561	(1,166,641)
352 Structures and Improvements	140,331,126	11,390,447	20,794,894	9,404,447
353 Station Equipment	1,254,947,887	253,550,998	246,836,487	(6,714,511)
354 Towers and Fixtures	162,448,132	37,312,513	77,462,172	40,149,659
355 Poles and Fixtures	713,704,510	147,302,734	122,213,051	(25,089,684)
356 Overhead Conductors and Devices	395,884,944	87,021,670	74,626,989	(12,394,682)
357 Underground Conduit	47,278,487	10,768,768	8,755,677	(2,013,091)
358 Underground Conductors and Devices	72,023,257	20,863,524	18,694,624	(2,168,900)
359 Roads and Trails	3,949,563	1,387,994	1,381,397	(6,597)
Total Transmission	2,886,692,046	586,409,851	586,409,851	0

DISTRIBUTION

360.2 Land Rights	48,034,185	5,792,364	5,455,557	(336,807)
361 Structures and Improvements	100,313,565	18,783,848	21,540,215	2,756,367
362 Station Equipment	743,061,487	172,494,645	196,604,884	24,110,240
363 Energy Storage Equipment	0	0	0	0
364 Poles, Towers and Fixtures	470,714,126	108,307,668	125,569,680	17,262,012
365 Overhead Conductors and Devices	459,383,325	103,902,437	98,641,067	(5,261,370)
366 Underground Conduit	493,902,587	115,804,126	117,858,214	2,054,088
367 Underground Conductors and Devices	2,029,768,356	538,722,770	498,507,557	(40,215,213)
368 Line Transformers	631,352,446	201,074,360	184,256,288	(16,818,072)

Public Service of Colorado
Comparison of Plant,, Book Depreciation Reserve, and Reallocated Reserve
At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020	Per Books Total Reserve Balance 12/31/2020	Reallocated Total Reserve Balance 12/31/2020	Difference
		(1)	(2)	(3)	(4)
	369 Services	23,234,652	23,481,213	23,005,394	(475,819)
	369.1 Services-Overhead	53,410,962	21,590,325	26,313,859	4,723,534
	369.2 Services-Underground	245,578,470	148,441,226	141,645,955	(6,795,271)
	370 Meters	164,096,208	84,984,454	75,362,667	(9,621,787)
	370.02 Meters - AGIS - AMI Equipment	8,551,008	354,263	588,887	234,624
	370.2 Meters-AMR	71,651,601	66,003,307	64,548,254	(1,455,054)
	371 Installation on Customer Premises	6,551,765	3,883,491	4,444,892	561,401
	371.4 Installations on Customer's Premises-EV	0	0	0	0
	373 Street Lighting and Signal Systems	179,254,398	37,668,869	66,945,996	29,277,127
	Total Distribution	5,728,859,142	1,651,289,366	1,651,289,366	0
<u>ELECTRIC GENERAL</u>					
	389.2 Land Rights	0	0		0
	390 Structures and Improvements	11,906,292	2,456,207	1,901,965	(554,241)
	391 Office Furniture and Equipment	7,849,337	2,939,499	2,511,293	(428,206)
	391.2 Computer Hardware	27,086,580	11,839,703	9,931,937	(1,907,766)
	392.1 Transportation Equipment-Autos	965,002	586,500	628,181	41,681
	392.2 Transportation Equipment-Light Trucks	29,920,392	10,483,989	13,246,033	2,762,044
	392.3 Transportation Equipment-Trailers	7,636,594	2,809,159	2,017,737	(791,422)
	392.4 Transportation Equipment-Heavy Trucks	64,664,121	23,526,380	28,349,393	4,823,014
	393 Stores Equipment	156,423	59,837	79,004	19,167
	394 Tools, Shop and Garage Equipment	52,429,112	16,917,938	22,485,357	5,567,419
	395 Laboratory Equipment	2,102,610	461,505	1,109,095	647,591
	396 Power Operated Equipment	11,411,266	6,331,349	5,389,765	(941,584)
	397 Communication Equipment	194,847,615	63,557,772	54,484,166	(9,073,606)
	398 Miscellaneous Equipment	1,579,247	882,959	718,869	(164,089)
	Total Electric General	412,554,590	142,852,796	142,852,796	0
	Total Electric Plant	16,029,284,953	4,392,411,571	4,392,411,571	(0)
<u>COMMON INTANGIBLE</u>					
	301 Organization Costs				
	302 Franchises and Consents	3,383,421	2,862,419	2,862,419	0
	303 Misc Computer Software-3 Year	14,423,656	7,616,195	7,616,195	0
	303.03 Misc Computer Software-7 Year	200,827,839	94,806,179	94,806,179	0
	303.07 Misc Computer Software-10 Year	9,940,144	7,161,249	7,161,249	0
	303.10 Misc Computer Software-15 Year	156,791,894	38,454,806	38,454,806	0
	Total Common Intangible	385,366,955	150,900,847	150,900,847	0

Public Service of Colorado
Comparison of Plant,, Book Depreciation Reserve, and Reallocated Reserve
At December 31, 2020

Plant/ Unit/FERC Account	Description	Plant Balance 12/31/2020 (1)	Per Books Total Reserve Balance 12/31/2020 (2)	Reallocated Total Reserve Balance 12/31/2020 (3)	Difference (4)
<u>COMMON GENERAL</u>					
389.2	Land Rights	0	0	0	0
390	Structures and Improvements	188,650,268	50,700,440	49,467,823	(1,232,617)
390.07	Structures and Improvements - Leasehold Improvements	2,200,824	2,546,635	2,546,635	0
390.85	Structures and Improvements - 1800 Larimer	17,126,036	11,407,116	11,407,116	0
391	Office Furniture and Equipment	27,998,991	13,486,091	12,789,158	(696,933)
391.04	Computer Hardware	170,911,026	81,604,495	84,303,494	2,698,999
392.1	Transportation Equipment - Automobiles	2,618,398	1,418,463	1,605,948	187,485
392.2	Transportation Equipment - Light Trucks	7,280,300	2,060,357	4,309,735	2,249,379
392.3	Transportation Equipment - Trailers	3,359,668	636,539	829,173	192,634
392.4	Transportation Equipment - Heavy Trucks	5,246,997	3,100,961	3,173,919	72,958
393	Stores Equipment	349,039	263,072	282,260	19,188
394	Tools and Shop Equipment	7,354,785	3,293,216	4,231,798	938,582
395	Laboratory Equipment	228,526	39,607	78,051	38,444
396	Power Operated Equipment	2,392,301	1,122,509	1,515,541	393,032
397	Communication Equipment	73,787,628	29,127,085	24,330,864	(4,796,221)
398	Miscellaneous Equipment	964,017	944,745	879,815	(64,930)
Total Common General Plant		510,468,803	201,751,331	201,751,331	0
Total Common Plant		895,835,758	352,652,179	352,652,179	0
Total Electric and Common		16,925,120,711	4,745,063,750	4,745,063,750	(0)

APPENDIX G

Dismantling Cost Allocation by Unit/Account

**Public Service of Colorado
Generation Plant
Computation of Composite Net Salvage
At December 31, 2020**

Production Unit	Account No.	Description	Plant Balance 12/31/2020 (1)	Interim Retirement \$	Interim Net Salvage %	Interim Net Salvage \$	Dismantling Cost \$	Total Net Salvage \$	Total Net Salvage %	B & M Estimate	Notes
STEAM PRODUCTION											
Cherokee Unit 2 SC	314	Turbogenerator Units	1,822,036	69,740	-15.00%	(10,461)	0	(10,461)	-0.57%		
Cherokee Unit 2 SC	315	Accessory Electric Equipment	2,060,951	68,867	-10.00%	(6,887)	0	(6,887)	-0.33%		
		Cherokee Unit 2 SC - Total/Composite	3,882,987	138,607		(17,348)	0	(17,348)	-0.45%	0	
Cherokee Unit 4	311	Structures and Improvements	11,176,565	210,833	-20.00%	(42,167)	(1,399,380)	(1,441,547)	-12.90%		
Cherokee Unit 4	312	Boiler Plant Equipment	41,421,999	2,019,596	-15.00%	(302,939)	(5,186,310)	(5,489,249)	-13.25%		
Cherokee Unit 4	312	Boiler Plant AQIR	2,094,832	89,613	0.00%	0	(262,287)	(262,287)	-12.52%		
Cherokee Unit 4	314	Turbogenerator Units	26,921,788	1,258,237	-15.00%	(188,735)	(3,370,787)	(3,559,523)	-13.22%		
Cherokee Unit 4	315	Accessory Electric Equipment	8,681,064	322,640	-10.00%	(32,264)	(1,086,927)	(1,119,191)	-12.89%		
Cherokee Unit 4	315.2	Computers and Peripherals	3,233,582	0	0.00%	0	0	0	0.00%		
Cherokee Unit 4	316	Miscellaneous Equipment	548,747	29,833	-5.00%	(1,492)	(68,707)	(70,198)	-12.79%		
		Cherokee Unit 4 - Total/Composite	94,078,576	3,930,751		(567,597)	(11,374,398)	(11,941,995)	-12.69%	(11,374,398)	
Cherokee Common	310.20	Land Rights	12,865,962	0	0.00%	0	0	0	0.00%		
Cherokee Common	310.30	Water Rights	112,245	0	0.00%	0	0	0	0.00%		
Cherokee Common	311	Structures and Improvements	43,733,073	411,124	-20.00%	(82,225)	(6,992,917)	(7,075,141)	-16.18%		
Cherokee Common	312	Boiler Plant Equipment	10,756,698	469,687	-15.00%	(70,453)	(1,719,996)	(1,790,449)	-16.64%		
Cherokee Common	312	Boiler Plant AQIR	2,461,276	105,288	0.00%	0	(393,558)	(393,558)	-15.99%		
Cherokee Common	314	Turbogenerator Units	229,286	7,507	-15.00%	(1,126)	(36,663)	(37,789)	-16.48%		
Cherokee Common	315	Accessory Electric Equipment	9,369,122	287,520	-10.00%	(28,752)	(1,498,122)	(1,526,874)	-16.30%		
Cherokee Common	316	Miscellaneous Equipment	1,654,248	92,385	-5.00%	(4,619)	(264,514)	(269,133)	-16.27%		
		Cherokee Common - Total/Composite	81,181,909	1,373,512		(187,175)	(10,905,769)	(11,092,945)	-13.66%	(10,905,769)	
Coal Cars	312	Boiler Plant Equipment	20,020,245	0	0.00%	0	0	0	0.00%		
Comanche Unit 1	311	Structures and Improvements	16,633,155	1,119,209	-20.00%	(223,842)	(504,105)	(727,946)	-4.38%		
Comanche Unit 1	312	Boiler Plant Equipment	216,416,165	19,474,614	-15.00%	(2,921,192)	(6,558,972)	(9,480,164)	-4.38%		
Comanche Unit 1	314	Turbogenerator Units	40,220,828	3,037,389	-15.00%	(455,608)	(1,218,981)	(1,674,590)	-4.16%		
Comanche Unit 1	315	Accessory Electric Equipment	20,471,436	1,659,058	-10.00%	(165,906)	(620,432)	(786,338)	-3.84%		
Comanche Unit 1	315.2	Computers and Peripherals	1,407,501	0	0.00%	0	0	0	0.00%		
Comanche Unit 1	316	Miscellaneous Equipment	914,298	114,005	-5.00%	(5,700)	(27,710)	(33,410)	-3.65%		
		Comanche Unit 1 - Total/Composite	296,063,384	25,404,275		(3,772,248)	(8,930,200)	(12,702,448)	-4.29%	(8,930,200)	
Comanche Unit 2	311	Structures and Improvements	8,413,195	889,654	-20.00%	(177,931)	(304,480)	(482,410)	-5.73%		
Comanche Unit 2	312	Boiler Plant Equipment	177,575,948	18,939,611	-15.00%	(2,840,942)	(6,426,606)	(9,267,547)	-5.22%		
Comanche Unit 2	314	Turbogenerator Units	40,368,504	4,272,232	-15.00%	(640,835)	(1,460,966)	(2,101,801)	-5.21%		
Comanche Unit 2	315	Accessory Electric Equipment	22,984,266	1,841,037	-10.00%	(184,104)	(831,818)	(1,015,921)	-4.42%		
Comanche Unit 2	316	Miscellaneous Equipment	871,236	139,766	-5.00%	(6,988)	(31,531)	(38,519)	-4.42%		
		Comanche Unit 2 - Total/Composite	250,213,149	26,082,298		(3,850,799)	(9,055,400)	(12,906,199)	-5.16%	(9,055,400)	
Comanche Cm Retire with Unit 1 & 2	311	Structures and Improvements	1,505,849	63,003	-20.00%	(12,601)	(631,901)	(644,501)	-42.80%		
Comanche Cm Retire with Unit 1 & 2	312	Boiler Plant Equipment	14,842,287	1,713,113	-15.00%	(256,967)	(6,228,280)	(6,485,247)	-43.69%		
Comanche Cm Retire with Unit 1 & 2	314	Turbogenerator Units	2,133,205	242,233	-15.00%	(36,335)	(895,159)	(931,494)	-43.67%		
Comanche Cm Retire with Unit 1 & 2	315	Accessory Electric Equipment	1,643,329	50,496	-10.00%	(5,050)	(689,591)	(694,641)	-42.27%		
Comanche Cm Retire with Unit 1 & 2	315.2	Computers and Peripherals	190,989	0	0.00%	0	0	0	0.00%		
Comanche Cm Retire with Unit 1 & 2	316	Miscellaneous Equipment	661,437	74,962	-5.00%	(3,748)	(277,559)	(281,307)	-42.53%		
		Comanche Cm Retire with Unit 1 & 2 - Total/Composite	20,977,095	2,143,807		(314,700)	(8,722,489)	(9,037,190)	-43.08%	(8,722,489)	
Comanche Unit 3	310.2	Land Rights	8,159	0	0.00%	0	0	0	0.00%		
Comanche Unit 3	311	Structures and Improvements	129,287,485	22,613,490	-20.00%	(4,522,698)	(1,308,495)	(5,831,193)	-4.51%		
Comanche Unit 3	312	Boiler Plant Equipment	544,630,626	216,596,067	-15.00%	(32,489,410)	(5,512,109)	(38,001,519)	-6.98%		
Comanche Unit 3	314	Turbogenerator Units	166,669,836	69,340,322	-15.00%	(10,401,048)	(1,686,835)	(12,087,884)	-7.25%		
Comanche Unit 3	315	Accessory Electric Equipment	90,629,149	24,623,204	-10.00%	(2,462,320)	(917,241)	(3,379,562)	-3.73%		
Comanche Unit 3	315.2	Computers and Peripherals	0	0	0.00%	0	0	0	0.00%		
Comanche Unit 3	316	Miscellaneous Equipment	19,398,331	10,037,284	-5.00%	(501,864)	(196,327)	(698,191)	-3.60%		
		Comanche Unit 3 - Total/Composite	950,623,587	343,210,366		(50,377,341)	(9,621,008)	(59,998,349)	-6.31%	(9,621,008)	
Comanche Cm Retire with Unit 3	311	Structures and Improvements	31,692,101	17,710,005	-20.00%	(3,542,001)	(20,152,265)	(23,694,266)	-74.76%		
Comanche Cm Retire with Unit 3	312	Boiler Plant Equipment	18,715,540	7,660,229	-15.00%	(1,149,034)	(11,900,774)	(13,049,808)	-69.73%		
Comanche Cm Retire with Unit 3	314	Turbogenerator Units	178,872	78,934	-15.00%	(11,840)	(113,741)	(125,581)	-70.21%		
Comanche Cm Retire with Unit 3	315	Accessory Electric Equipment	2,434,794	1,230,035	-10.00%	(123,004)	(1,548,228)	(1,671,232)	-68.64%		
Comanche Cm Retire with Unit 3	315.2	Computers and Peripherals	0	0	0.00%	0	0	0	0.00%		
Comanche Cm Retire with Unit 3	316	Miscellaneous Equipment	1,892,038	1,056,281	-5.00%	(52,814)	(1,203,102)	(1,255,916)	-66.38%		
		Comanche Cm Retire with Unit 3 - Total/Composite	54,913,345	27,735,484		(4,878,693)	(34,918,110)	(39,796,803)	-72.47%	(34,918,110)	

Public Service of Colorado
Generation Plant
Computation of Composite Net Salvage
At December 31, 2020

Production Unit	Account No.	Description	Plant Balance 12/31/2020 (1)	Interim Retirement \$	Interim Net Salvage %	Interim Net Salvage \$	Dismantling Cost \$	Total Net Salvage \$	Total Net Salvage %	B & M Estimate	Notes
Craig Unit 1	311	Structures and Improvements	6,681,129	94,869	-20.00%	(18,974)	(170,045)	(189,019)	-2.83%		
Craig Unit 1	312	Boiler Plant Equipment	18,516,678	618,940	-15.00%	(92,841)	(471,277)	(564,118)	-3.05%		
Craig Unit 1	314	Turbogenerator Units	2,342,209	16,954	-15.00%	(2,543)	(59,613)	(62,156)	-2.65%		
Craig Unit 1	315	Accessory Electric Equipment	2,901,979	67,557	-10.00%	(6,756)	(73,860)	(80,615)	-2.78%		
Craig Unit 1	316	Miscellaneous Equipment	122,465	5,586	-5.00%	(279)	(3,117)	(3,396)	-2.77%		
Craig Unit 1 - Total/Composite			30,564,460	803,906		(121,393)	(777,911)	(899,304)	-2.94%	(777,911)	
Craig Unit 2	311	Structures and Improvements	6,571,154	838,890	-20.00%	(167,778)	(100,865)	(268,643)	-4.09%		
Craig Unit 2	312	Boiler Plant Equipment	33,300,984	4,609,229	-15.00%	(691,384)	(511,159)	(1,202,544)	-3.61%		
Craig Unit 2	314	Turbogenerator Units	7,102,887	930,620	-15.00%	(139,593)	(109,027)	(248,620)	-3.50%		
Craig Unit 2	315	Accessory Electric Equipment	3,564,960	572,046	-10.00%	(57,205)	(54,721)	(111,926)	-3.14%		
Craig Unit 2	316	Miscellaneous Equipment	139,310	29,150	-5.00%	(1,457)	(2,138)	(3,596)	-2.58%		
Craig Unit 2 - Total/Composite			50,679,294	6,979,935		(1,057,417)	(777,911)	(1,835,328)	-3.62%	(777,911)	
Craig Common	311	Structures and Improvements	7,300,852	713,009	-20.00%	(142,602)	(1,013,089)	(1,155,691)	-15.83%		
Craig Common	312	Boiler Plant Equipment	23,740,228	3,352,313	-15.00%	(502,847)	(3,294,269)	(3,797,116)	-15.99%		
Craig Common	314	Turbogenerator Units	3,300,265	467,899	-15.00%	(70,185)	(457,955)	(528,140)	-16.00%		
Craig Common	315	Accessory Electric Equipment	2,111,220	279,161	-10.00%	(27,916)	(292,960)	(320,876)	-15.20%		
Craig Common	315.2	Computers and Peripherals	319,851	0	0.00%	0	0	0	0.00%		
Craig Common	316	Miscellaneous Equipment	2,006,357	354,247	-5.00%	(17,712)	(278,408)	(296,121)	-14.76%		
Craig Common - Total/Composite			38,778,773	5,166,628		(761,262)	(5,336,682)	(6,097,944)	-15.72%	(5,336,682)	
Hayden Unit 1	311	Structures and Improvements	6,751,016	800,646	-20.00%	(160,129)	(387,433)	(547,562)	-8.11%		
Hayden Unit 1	312	Boiler Plant Equipment	122,772,414	8,012,982	-15.00%	(1,201,947)	(7,045,759)	(8,247,706)	-6.72%		
Hayden Unit 1	314	Turbogenerator Units	17,831,841	1,212,609	-15.00%	(181,891)	(1,023,348)	(1,205,239)	-6.76%		
Hayden Unit 1	315	Accessory Electric Equipment	5,142,587	481,996	-10.00%	(48,200)	(295,127)	(343,326)	-6.68%		
Hayden Unit 1	315.2	Computers and Peripherals	1,135,642	0	0.00%	0	0	0	0.00%		
Hayden Unit 1	316	Miscellaneous Equipment	257,721	27,015	-5.00%	(1,351)	(14,790)	(16,141)	-6.26%		
Hayden Unit 1 - Total/Composite			153,891,720	10,535,249		(1,593,518)	(8,766,456)	(10,359,974)	-6.73%	(8,766,456)	
Hayden Unit 2	311	Structures and Improvements	27,926,499	1,376,918	-20.00%	(275,384)	(716,239)	(991,623)	-3.55%		
Hayden Unit 2	312	Boiler Plant Equipment	99,358,411	11,585,083	-15.00%	(1,737,762)	(2,548,275)	(4,286,037)	-4.31%		
Hayden Unit 2	314	Turbogenerator Units	15,131,935	1,996,424	-15.00%	(299,464)	(388,093)	(687,557)	-4.54%		
Hayden Unit 2	315	Accessory Electric Equipment	6,993,246	900,701	-10.00%	(90,070)	(179,358)	(269,428)	-3.85%		
Hayden Unit 2	315.2	Computers and Peripherals	975,875	0	0.00%	0	0	0	0.00%		
Hayden Unit 2	316	Miscellaneous Equipment	1,165,183	171,431	-5.00%	(8,572)	(29,884)	(38,455)	-3.30%		
Hayden Unit 2 - Total/Composite			151,551,148	16,030,557		(2,411,251)	(3,861,849)	(6,273,101)	-4.14%	(3,861,849)	
Hayden Common	311	Structures and Improvements	7,904,667	93,518	-20.00%	(18,704)	(2,756,669)	(2,775,372)	-35.11%		
Hayden Common	312	Boiler Plant Equipment	29,313,231	3,327,170	-15.00%	(499,076)	(10,222,678)	(10,721,753)	-36.58%		
Hayden Common	314	Turbogenerator Units	1,590,973	113,492	-15.00%	(17,024)	(554,835)	(571,859)	-35.94%		
Hayden Common	315	Accessory Electric Equipment	299,321	9,833	-10.00%	(983)	(104,385)	(105,368)	-35.20%		
Hayden Common	316	Miscellaneous Equipment	1,970,611	258,479	-5.00%	(12,924)	(687,230)	(700,154)	-35.53%		
Hayden Common - Total/Composite			41,078,804	3,802,492		(548,710)	(14,325,796)	(14,874,506)	-36.21%	(14,325,796)	
Pawnee Unit 1	311	Structures and Improvements	141,874,484	19,646,068	-20.00%	(3,929,214)	(2,204,854)	(6,134,068)	-4.32%		
Pawnee Unit 1	312	Boiler Plant Equipment	567,806,245	86,472,018	-15.00%	(12,970,803)	(8,824,209)	(21,795,012)	-3.84%		
Pawnee Unit 1	314	Turbogenerator Units	75,873,783	12,455,541	-15.00%	(1,868,331)	(1,179,145)	(3,047,476)	-4.02%		
Pawnee Unit 1	315	Accessory Electric Equipment	61,689,230	10,878,074	-10.00%	(1,087,807)	(958,705)	(2,046,512)	-3.32%		
Pawnee Unit 1	315.2	Computers and Peripherals	8,163,408	0	0.00%	0	0	0	0.00%		
Pawnee Unit 1	316	Miscellaneous Equipment	6,182,794	1,440,489	-5.00%	(72,024)	(96,086)	(168,110)	-2.72%		
Pawnee Unit 1 - Total/Composite			861,589,944	130,892,190		(19,928,179)	(13,263,000)	(33,191,179)	-3.85%	(13,263,000)	
Pawnee Common	311	Structures and Improvements	20,560,345	120,910	-20.00%	(24,182)	(25,757,984)	(25,782,166)	-125.40%		
Pawnee Common	312	Boiler Plant Equipment	25,954,446	3,745,017	-15.00%	(561,753)	(32,515,709)	(33,077,462)	-127.44%		
Pawnee Common	314	Turbogenerator Units	309,543	37,137	-15.00%	(5,571)	(387,796)	(393,366)	-127.08%		
Pawnee Common	315	Accessory Electric Equipment	938,730	68,319	-10.00%	(6,832)	(1,176,041)	0	0.00%		
Pawnee Common	315.2	Computers and Peripherals	465,779	0	0.00%	0	0	0	0.00%		
Pawnee Common	316	Miscellaneous Equipment	2,950,489	556,149	-5.00%	(27,807)	(3,696,370)	(3,724,177)	-126.22%		
Pawnee Common - Total/Composite			51,179,333	4,527,533		(626,145)	(63,533,900)	(62,977,172)	-123.05%	(63,533,900)	
Total Steam Production			3,151,267,254	608,757,590		(91,013,777)	(204,170,880)	(294,001,785)	-9.33%		

**Public Service of Colorado
Generation Plant
Computation of Composite Net Salvage
At December 31, 2020**

Production Unit	Account No.	Description	Plant Balance 12/31/2020 (1)	Interim Retirement \$	Interim Net Salvage %	Interim Net Salvage \$	Dismantling Cost \$	Total Net Salvage \$	Total Net Salvage %	B & M Estimate	Notes
HYDRAULIC PRODUCTION											
Ames	331	Structures & Improvements	399,964	33,692	-10.00%	(3,369)	(231,852)	(235,222)	-58.81%		
Ames	332	Reservoirs, Dams & Waterways	9,790,217	1,425,806	-10.00%	(142,581)	(5,675,228)	(5,817,808)	-59.42%		
Ames	333	Waterwheels, Turbines & Generators	156,202	29,534	-10.00%	(2,953)	(90,548)	(93,501)	-59.86%		
Ames	334	Accessory Electric Equipment	1,760,800	628,426	-10.00%	(62,843)	(1,020,707)	(1,083,549)	-61.54%		
Ames	335	Misc. Power Plant Equipment	102,063	25,869	-5.00%	(1,293)	(59,164)	(60,457)	-59.24%		
Ames	335.2	Recreational Facilities	168,012	41,111	-5.00%	(2,056)	(97,394)	(99,450)	-59.19%		
Ames	336	Roads, Railroads & Bridges	21,231	4,869	0.00%	0	(12,307)	(12,307)	-57.97%		
Ames - Total/Composite			12,398,488	2,189,308		(215,095)	(7,187,200)	(7,402,295)	-59.70%	(7,187,200)	
Cabin Creek	331	Structures & Improvements	20,153,917	6,442,962	-10.00%	(644,296)	(13,213,823)	(13,858,119)	-68.76%		
Cabin Creek	332	Reservoirs, Dams & Waterways	21,375,865	12,664,986	-10.00%	(1,266,499)	(14,014,987)	(15,281,485)	-71.49%		
Cabin Creek	333	Waterwheels, Turbines & Generators	19,676,896	9,057,830	-10.00%	(905,783)	(12,901,066)	(13,806,849)	-70.17%		
Cabin Creek	334	Accessory Electric Equipment	4,738,508	2,016,889	-10.00%	(201,689)	(3,106,781)	(3,308,470)	-69.82%		
Cabin Creek	334.2	Computers & Peripherals	56,206		0.00%	0	0	0	0.00%		
Cabin Creek	335	Misc. Power Plant Equipment	696,051	256,114	-5.00%	(12,806)	(456,363)	(469,168)	-67.40%		
Cabin Creek	335.2	Recreational Facilities	3,927	1,562	-5.00%	(78)	(2,575)	(2,653)	-67.55%		
Cabin Creek	336	Roads, Railroads & Bridges	453,762	244,233	0.00%	0	(297,507)	(297,507)	-65.56%		
Cabin Creek - Total/Composite			67,155,131	30,684,576		(3,031,150)	(43,993,100)	(47,024,250)	-70.02%	(43,993,100)	
Georgetown	331	Structures & Improvements	147,604	6,443	-10.00%	(644)	(44,327)	(44,971)	-30.47%		
Georgetown	332	Reservoirs, Dams & Waterways	20,294,802	505,492	-10.00%	(50,549)	(6,094,743)	(6,145,292)	-30.28%		
Georgetown	333	Waterwheels, Turbines & Generators	384,215	8,096	-10.00%	(810)	(115,384)	(116,193)	-30.24%		
Georgetown	334	Accessory Electric Equipment	522,378	77,283	-10.00%	(7,728)	(156,875)	(164,604)	-31.51%		
Georgetown	335	Misc. Power Plant Equipment	1,317	247	-5.00%	(12)	(396)	(408)	-30.97%		
Georgetown	335.2	Recreational Facilities	240,335	26,578	-5.00%	(1,329)	(72,175)	(73,504)	-30.58%		
Georgetown - Total/Composite			21,590,651	624,139		(61,073)	(6,483,900)	(6,544,973)	-30.31%	(6,483,900)	
Salida	331	Structures & Improvements	82,936	1,911	-10.00%	(191)	(231,526)	(231,717)	-279.39%		
Salida	332	Reservoirs, Dams & Waterways	2,704,463	27,709	-10.00%	(2,771)	(7,549,831)	(7,552,602)	-279.26%		
Salida	333	Waterwheels, Turbines & Generators	24,873	1,254	-10.00%	(125)	(69,436)	(69,561)	-279.67%		
Salida	334	Accessory Electric Equipment	273,607	16,378	-10.00%	(1,638)	(763,805)	(765,443)	-279.76%		
Salida	335	Misc. Power Plant Equipment	1,900	215	-5.00%	(11)	(5,304)	(5,315)	-279.73%		
Salida	335.2	Recreational Facilities	151,492	4,181	-5.00%	(209)	(422,909)	(423,118)	-279.30%		
Salida	336	Roads, Railroads & Bridges	20,450	566	0.00%	0	(57,088)	(57,088)	-279.16%		
Salida - Total/Composite			3,259,721	52,214		(4,945)	(9,099,900)	(9,104,845)	-279.31%	(9,099,900)	
Shoshone	331	Structures & Improvements	4,215,418	187,413	-10.00%	(18,741)	(223,284)	(242,025)	-5.74%		
Shoshone	332	Reservoirs, Dams & Waterways	16,859,400	2,457,787	-10.00%	(245,779)	(893,016)	(1,138,795)	-6.75%		
Shoshone	333	Waterwheels, Turbines & Generators	3,668,464	1,239,200	-10.00%	(123,920)	(194,313)	(318,233)	-8.67%		
Shoshone	334	Accessory Electric Equipment	3,331,273	1,368,407	-10.00%	(136,841)	(176,452)	(313,293)	-9.40%		
Shoshone	335	Misc. Power Plant Equipment	878,735	233,201	-5.00%	(11,660)	(46,545)	(58,205)	-6.62%		
Shoshone	336	Roads, Railroads & Bridges	9,247	4,750	0.00%	0	(490)	(490)	-5.30%		
Shoshone - Total/Composite			28,962,536	5,490,758		(536,941)	(1,534,100)	(2,071,041)	-7.15%	(1,534,100)	
Tacoma	331	Structures & Improvements	310,681	10,521	-10.00%	(1,052)	(123,550)	(124,602)	-40.11%		
Tacoma	332	Reservoirs, Dams & Waterways	17,318,247	1,292,582	-10.00%	(129,258)	(6,887,036)	(7,016,294)	-40.51%		
Tacoma	333	Waterwheels, Turbines & Generators	1,214,415	407,943	-10.00%	(40,794)	(482,943)	(523,737)	-43.13%		
Tacoma	334	Accessory Electric Equipment	2,876,031	774,523	-10.00%	(77,452)	(1,143,726)	(1,221,178)	-42.46%		
Tacoma	335	Misc. Power Plant Equipment	213,111	72,461	-5.00%	(3,623)	(84,749)	(88,372)	-41.47%		
Tacoma	335.2	Recreational Facilities	478,920	172,189	-5.00%	(8,609)	(190,455)	(199,064)	-41.57%		
Tacoma	336	Roads, Railroads & Bridges	270,175	108,745	0.00%	0	(107,442)	(107,442)	-39.77%		
Tacoma - Total/Composite			22,681,580	2,838,964		(260,789)	(9,019,900)	(9,280,689)	-40.92%	(9,019,900)	
Total Hydraulic Production			156,048,107	41,879,959		(4,109,993)	(77,318,100)	(81,428,093)	-52.18%		

**Public Service of Colorado
Generation Plant
Computation of Composite Net Salvage
At December 31, 2020**

Production Unit	Account No.	Description	Plant Balance 12/31/2020 (1)	Interim Retirement \$	Interim Net Salvage %	Interim Net Salvage \$	Dismantling Cost \$	Total Net Salvage \$	Total Net Salvage %	B & M Estimate	Notes
OTHER PRODUCTION											
Alamosa	341	Structures and Improvements	526,020	9,485	-20.00%	(1,897)	(38,193)	(40,090)	-7.62%		
Alamosa	342	Fuel Holders, Producers, and Accessories	331,421	22,424	-5.00%	(1,121)	(24,064)	(25,185)	-7.60%		
Alamosa	343	Prime Movers	0	0	-10.00%	0	0	0			
Alamosa	344	Generators	7,625,547	351,086	-10.00%	(35,109)	(553,673)	(588,782)	-7.72%		
Alamosa	345	Accessory Electric Equipment	994,564	25,483	-10.00%	(2,548)	(72,213)	(74,761)	-7.52%		
Alamosa	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Alamosa	346	Miscellaneous Power Plant Equipment	296,893	11,382	-10.00%	(1,138)	(21,557)	(22,695)	-7.64%		
Alamosa - Total/Composite			9,774,446	419,859		(41,813)	(709,700)	(751,513)	-7.69%	(709,700)	
Blue Spruce	341	Structures and Improvements	0	0	-20.00%	0	0	0			
Blue Spruce	342	Fuel Holders, Producers, and Accessories	0	0	-5.00%	0	0	0			
Blue Spruce	343	Prime Movers	0	0	-10.00%	0	0	0			
Blue Spruce	344	Generators	218,253,183	42,735,148	-10.00%	(4,273,515)	(4,015,608)	(8,289,122)	-3.80%		
Blue Spruce	345	Accessory Electric Equipment	923,556	158,164	-10.00%	(15,816)	(16,992)	(32,809)	-3.55%		
Blue Spruce	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Blue Spruce	346	Miscellaneous Power Plant Equipment	0	0	-10.00%	0	0	0			
Blue Spruce - Total/Composite			219,176,738	42,893,313		(4,289,331)	(4,032,600)	(8,321,931)	-3.80%	(4,032,600)	
Cherokee 5-7	341	Structures and Improvements	126,064,022	15,515,051	-20.00%	(3,103,010)	(1,714,444)	(4,817,454)	-3.82%		
Cherokee 5-7	342	Fuel Holders, Producers, and Accessories	5,680,939	626,761	-5.00%	(31,338)	(77,260)	(108,598)	-1.91%		
Cherokee 5-7	343	Prime Movers	131,493,260	32,566,034	-10.00%	(3,256,603)	(1,788,281)	(5,044,884)	-3.84%		
Cherokee 5-7	344	Generators	244,245,248	53,793,354	-10.00%	(5,379,335)	(3,321,684)	(8,701,019)	-3.56%		
Cherokee 5-7	345	Accessory Electric Equipment	63,675,645	13,480,940	-10.00%	(1,348,094)	(865,975)	(2,214,069)	-3.48%		
Cherokee 5-7	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Cherokee 5-7	346	Miscellaneous Power Plant Equipment	27,526,672	20,442,000	-10.00%	(2,044,200)	(374,357)	(2,418,557)	-8.79%		
Cherokee 5-7 - Total/Composite			598,685,786	136,424,141		(15,162,581)	(8,142,000)	(23,304,581)	-3.89%	(8,142,000)	
Fruita	340	Land Rights	452	0		0	0	0	0.00%		
Fruita	341	Structures and Improvements	92,014	3,787	-20.00%	(757)	(9,218)	(9,976)	-10.84%		
Fruita	342	Fuel Holders, Producers, and Accessories	599,152	19,817	-5.00%	(991)	(60,026)	(61,017)	-10.18%		
Fruita	343	Prime Movers	0	0	-10.00%	0	0	0			
Fruita	344	Generators	2,512,252	117,429	-10.00%	(11,743)	(251,689)	(263,432)	-10.49%		
Fruita	345	Accessory Electric Equipment	74,773	2,304	-10.00%	(230)	(7,491)	(7,721)	-10.33%		
Fruita	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Fruita	346	Miscellaneous Power Plant Equipment	200,385	7,800	-10.00%	(780)	(20,075)	(20,856)	-10.41%		
Fruita - Total/Composite			3,479,028	151,137		(14,502)	(348,500)	(363,002)	-10.43%	(348,500)	
Ft Saint Vrain Unit 1	341	Structures and Improvements	22,903,499	3,901,293	-20.00%	(780,259)	(385,069)	(1,165,328)	-5.09%		
Ft Saint Vrain Unit 1	342	Fuel Holders, Producers, and Accessories	3,664,793	912,025	-5.00%	(45,601)	(61,615)	(107,216)	-2.93%		
Ft Saint Vrain Unit 1	343	Prime Movers	4,065,900	545,863	-10.00%	(54,586)	(68,359)	(122,945)	-3.02%		
Ft Saint Vrain Unit 1	344	Generators	78,003,472	12,547,122	-10.00%	(1,254,712)	(1,311,448)	(2,566,160)	-3.29%		
Ft Saint Vrain Unit 1	345	Accessory Electric Equipment	21,305,835	3,381,796	-10.00%	(338,180)	(358,208)	(696,388)	-3.27%		
Ft Saint Vrain Unit 1	345.2	Computers and Peripherals	95,966	0	0.00%	0	0	0	0.00%		
Ft Saint Vrain Unit 1	346	Miscellaneous Power Plant Equipment	3,788,835	1,268,602	-10.00%	(126,860)	(63,701)	(190,561)	-5.03%		
Ft Saint Vrain Unit 1 - Total/Composite			133,828,301	22,556,701		(2,600,198)	(2,248,400)	(4,848,598)	-3.62%	(2,248,400)	
Ft Saint Vrain Unit 2	341	Structures and Improvements	30,833	1,479	-20.00%	(296)	(749)	(1,045)	-3.39%		
Ft Saint Vrain Unit 2	342	Fuel Holders, Producers, and Accessories	594,312	22,787	-5.00%	(1,139)	(14,447)	(15,586)	-2.62%		
Ft Saint Vrain Unit 2	343	Prime Movers	2,779,822	385,448	-10.00%	(38,545)	(67,572)	(106,117)	-3.82%		
Ft Saint Vrain Unit 2	344	Generators	86,584,175	12,477,414	-10.00%	(1,247,741)	(2,104,701)	(3,352,442)	-3.87%		
Ft Saint Vrain Unit 2	345	Accessory Electric Equipment	1,968,283	220,089	-10.00%	(22,009)	(47,845)	(69,854)	-3.55%		
Ft Saint Vrain Unit 2	345.2	Computers and Peripherals	1,818,121	0	0.00%	0	0	0	0.00%		
Ft Saint Vrain Unit 2	346	Miscellaneous Power Plant Equipment	538,315	142,254	-10.00%	(14,225)	(13,085)	(27,311)	-5.07%		
Ft Saint Vrain Unit 2 - Total/Composite			94,313,861	13,249,469		(1,323,955)	(2,248,400)	(3,572,355)	-3.79%	(2,248,400)	
Ft Saint Vrain Unit 3	341	Structures and Improvements	0	0	-20.00%	0	0	0			
Ft Saint Vrain Unit 3	342	Fuel Holders, Producers, and Accessories	659,565	21,910	-5.00%	(1,096)	(42,983)	(44,078)	-6.68%		
Ft Saint Vrain Unit 3	343	Prime Movers	4,759,486	665,147	-10.00%	(66,515)	(310,166)	(376,681)	-7.91%		
Ft Saint Vrain Unit 3	344	Generators	28,404,319	3,237,830	-10.00%	(323,783)	(1,851,052)	(2,174,835)	-7.66%		
Ft Saint Vrain Unit 3	345	Accessory Electric Equipment	633,752	72,514	-10.00%	(7,251)	(41,300)	(48,552)	-7.66%		
Ft Saint Vrain Unit 3	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Ft Saint Vrain Unit 3	346	Miscellaneous Power Plant Equipment	44,486	9,585	-10.00%	(959)	(2,899)	(3,858)	-8.67%		
Ft Saint Vrain Unit 3 - Total/Composite			34,501,608	4,006,986		(399,603)	(2,248,400)	(2,648,003)	-7.68%	(2,248,400)	

Public Service of Colorado
Generation Plant
Computation of Composite Net Salvage
At December 31, 2020

Production Unit	Account No.	Description	Plant Balance 12/31/2020 (1)	Interim Retirement \$	Interim Net Salvage %	Interim Net Salvage \$	Dismantling Cost \$	Total Net Salvage \$	Total Net Salvage %	B & M Estimate	Notes
Ft Saint Vrain Unit 4	341	Structures and Improvements	3,062,941	502,191	-20.00%	(100,438)	(50,928)	(151,367)	-4.94%		
Ft Saint Vrain Unit 4	342	Fuel Holders, Producers, and Accessories	27,606,186	2,581,538	-5.00%	(129,077)	(459,016)	(588,093)	-2.13%		
Ft Saint Vrain Unit 4	343	Prime Movers	2,761,168	370,236	-10.00%	(37,024)	(45,911)	(82,934)	-3.00%		
Ft Saint Vrain Unit 4	344	Generators	93,927,607	12,535,535	-10.00%	(1,253,553)	(1,561,761)	(2,815,315)	-3.00%		
Ft Saint Vrain Unit 4	345	Accessory Electric Equipment	7,848,198	1,063,252	-10.00%	(106,325)	(130,494)	(236,819)	-3.02%		
Ft Saint Vrain Unit 4	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Ft Saint Vrain Unit 4	346	Miscellaneous Power Plant Equipment	17,384	10,408	-10.00%	(1,041)	(289)	(1,330)	-7.65%		
Ft Saint Vrain Unit 4 - Total/Composite			135,223,484	17,063,160		(1,627,458)	(2,248,400)	(3,875,858)	-2.87%	(2,248,400)	
Ft Saint Vrain Unit 5	341	Structures and Improvements	7,455,783	832,746	-20.00%	(166,549)	(12,210)	(178,760)	-2.40%		
Ft Saint Vrain Unit 5	342	Fuel Holders, Producers, and Accessories	2,200,775	234,039	-5.00%	(11,702)	(3,604)	(15,306)	-0.70%		
Ft Saint Vrain Unit 5	343	Prime Movers	1,327,090	262,289	-10.00%	(26,229)	(2,173)	(28,402)	-2.14%		
Ft Saint Vrain Unit 5	344	Generators	59,827,684	11,450,585	-10.00%	(1,145,059)	(97,981)	(1,243,039)	-2.08%		
Ft Saint Vrain Unit 5	345	Accessory Electric Equipment	12,563,319	1,528,418	-10.00%	(152,842)	(20,575)	(173,417)	-1.38%		
Ft Saint Vrain Unit 5	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Ft Saint Vrain Unit 5	346	Miscellaneous Power Plant Equipment	644,763	441,502	-10.00%	(44,150)	(1,056)	(45,206)	-7.01%		
Ft Saint Vrain Unit 5 - Total/Composite			84,019,415	14,749,579		(1,546,531)	(137,600)	(1,684,131)	-2.00%	(137,600)	
Ft Saint Vrain Unit 6	341	Structures and Improvements	7,364,719	822,769	-20.00%	(164,554)	(12,084)	(176,638)	-2.40%		
Ft Saint Vrain Unit 6	342	Fuel Holders, Producers, and Accessories	2,477,944	263,514	-5.00%	(13,176)	(4,066)	(17,242)	-0.70%		
Ft Saint Vrain Unit 6	343	Prime Movers	1,327,207	262,400	-10.00%	(26,240)	(2,178)	(28,418)	-2.14%		
Ft Saint Vrain Unit 6	344	Generators	62,860,470	11,969,093	-10.00%	(1,196,909)	(103,143)	(1,300,053)	-2.07%		
Ft Saint Vrain Unit 6	345	Accessory Electric Equipment	9,197,849	1,679,776	-10.00%	(167,978)	(15,092)	(183,070)	-1.99%		
Ft Saint Vrain Unit 6	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Ft Saint Vrain Unit 6	346	Miscellaneous Power Plant Equipment	631,726	443,101	-10.00%	(44,310)	(1,037)	(45,347)	-7.18%		
Ft Saint Vrain Unit 6 - Total/Composite			83,859,913	15,440,653		(1,613,166)	(137,600)	(1,750,766)	-2.09%	(137,600)	
Ft Saint Vrain Common	341	Structures and Improvements	13,330,432	1,633,745	-20.00%	(326,749)	(2,517,838)	(2,844,587)	-21.34%		
Ft Saint Vrain Common	342	Fuel Holders, Producers, and Accessories	1,911,610	558,243	-5.00%	(27,912)	(361,063)	(388,975)	-20.35%		
Ft Saint Vrain Common	343	Prime Movers	923,842	190,729	-10.00%	(19,073)	(174,494)	(193,567)	-20.95%		
Ft Saint Vrain Common	344	Generators	43,015,810	10,273,170	-10.00%	(1,027,317)	(8,124,781)	(9,152,098)	-21.28%		
Ft Saint Vrain Common	345	Accessory Electric Equipment	17,395,546	3,629,933	-10.00%	(362,993)	(3,285,652)	(3,648,646)	-20.97%		
Ft Saint Vrain Common	345.2	Computers and Peripherals	403,578	0	0.00%	0	0	0	0.00%		
Ft Saint Vrain Common	346	Miscellaneous Power Plant Equipment	1,753,887	989,178	-10.00%	(98,918)	(331,272)	(430,190)	-24.53%		
Ft Saint Vrain Common - Total/Composite			78,734,705	17,274,999		(1,862,962)	(14,795,100)	(16,658,062)	-21.16%	(14,795,100)	
Ft. Lupton CT	341	Structures and Improvements	191,963	5,320	-20.00%	(1,064)	(16,501)	(17,565)	-9.15%		
Ft. Lupton CT	342	Fuel Holders, Producers, and Accessories	350,190	9,980	-5.00%	(499)	(30,102)	(30,601)	-8.74%		
Ft. Lupton CT	343	Prime Movers	0	0	-10.00%	0	0	0			
Ft. Lupton CT	344	Generators	12,539,804	439,212	-10.00%	(43,921)	(1,077,901)	(1,121,822)	-8.95%		
Ft. Lupton CT	345	Accessory Electric Equipment	682,730	18,298	-10.00%	(1,830)	(58,686)	(60,516)	-8.86%		
Ft. Lupton CT	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Ft. Lupton CT	346	Miscellaneous Power Plant Equipment	4,773	455	-10.00%	(45)	(410)	(456)	-9.55%		
Ft. Lupton CT - Total/Composite			13,769,460	473,264		(47,359)	(1,183,600)	(1,230,959)	-8.94%	(1,183,600)	
Rocky Mountain	341	Structures and Improvements	8,956,582	830,001	-20.00%	(166,000)	(459,570)	(625,570)	-6.98%		
Rocky Mountain	342	Fuel Holders, Producers, and Accessories	2,279,742	157,689	-5.00%	(7,884)	(116,975)	(124,860)	-5.48%		
Rocky Mountain	343	Prime Movers	7,982,369	1,626,587	-10.00%	(162,659)	(409,582)	(572,241)	-7.17%		
Rocky Mountain	344	Generators	408,620,837	79,174,194	-10.00%	(7,917,419)	(20,966,674)	(28,884,093)	-7.07%		
Rocky Mountain	345	Accessory Electric Equipment	2,119,562	381,511	-10.00%	(38,151)	(108,756)	(146,908)	-6.93%		
Rocky Mountain	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Rocky Mountain	346	Miscellaneous Power Plant Equipment	774,543	382,177	-10.00%	(38,218)	(39,742)	(77,960)	-10.07%		
Rocky Mountain - Total/Composite			430,733,634	82,552,160		(8,330,332)	(22,101,300)	(30,431,632)	-7.07%	(22,101,300)	
Valmont 6	341	Structures and Improvements	15,622,333	374,835	-20.00%	(74,967)	(76,535)	(151,502)	-0.97%		
Valmont 6	342	Fuel Holders, Producers, and Accessories	1,161,386	28,779	-5.00%	(1,439)	(5,690)	(7,129)	-0.61%		
Valmont 6	343	Prime Movers	0	0	-10.00%	0	0	0			
Valmont 6	344	Generators	9,251,296	363,605	-10.00%	(36,361)	(45,323)	(81,683)	-0.88%		
Valmont 6	345	Accessory Electric Equipment	2,133,217	70,011	-10.00%	(7,001)	(10,451)	(17,452)	-0.82%		
Valmont 6	345.2	Computers and Peripherals	0	0	0.00%	0	0	0			
Valmont 6	346	Miscellaneous Power Plant Equipment	82,117	10,379	-10.00%	(1,038)	(402)	(1,440)	-1.75%		
Valmont 6 - Total/Composite			28,250,349	847,609		(120,805)	(138,400)	(259,205)	-0.92%	(138,400)	

**Public Service of Colorado
Generation Plant
Computation of Composite Net Salvage
At December 31, 2020**

Production Unit	Account No.	Description	Plant Balance 12/31/2020 (1)	Interim Retirement \$	Interim Net Salvage %	Interim Net Salvage \$	Dismantling Cost \$	Total Net Salvage \$	Total Net Salvage %	B & M Estimate	Notes
Valmont 7 & 8	341	Structures and Improvements	3,429,684	112,857	-20.00%	(22,571)	(248,836)	(271,408)	-7.91%		
Valmont 7 & 8	342	Fuel Holders, Producers, and Accessories	1,347,748	17,724	-5.00%	(886)	(97,784)	(98,670)	-7.32%		
Valmont 7 & 8	343	Prime Movers			-10.00%	0	0				
Valmont 7 & 8	344	Generators	6,923,940	582,386	-10.00%	(58,239)	(502,358)	(560,596)	-8.10%		
Valmont 7 & 8	345	Accessory Electric Equipment	7,940,596	651,639	-10.00%	(65,164)	(576,120)	(641,284)	-8.08%		
Valmont 7 & 8	345.2	Computers and Peripherals	0		0.00%	0					
Valmont 7 & 8	346	Miscellaneous Power Plant Equipment	162,661	21,113	-10.00%	(2,111)	(11,802)	(13,913)	-8.55%		
		Valmont 7 & 8 - Total/Composite	19,804,631	1,385,719		(148,971)	(1,436,900)	(1,585,871)	-8.01%	(1,436,900)	
Wind to Hydrogen	344	Generators	1,017,482	0	-10.00%	0	0	0	0.00%		
		Total Other Production	1,969,172,841	369,488,749		(39,129,569)	(62,156,900)	(101,286,469)	-5.14%		
WIND PRODUCTION											
Cheyenne Ridge WF	341	Structures and Improvements	26,510,642	0	0.00%	0	(636,462)	(636,462)	-2.40%		
Cheyenne Ridge WF	342	Fuel Holders, Producers, and Accessories	0	0	0.00%	0	0	0			
Cheyenne Ridge WF	344	Generators	589,177,653	0	-10.00%	0	(14,144,851)	(14,144,851)	-2.40%		
Cheyenne Ridge WF	345	Accessory Electric Equipment	0	0	-5.00%	0	0	0			
Cheyenne Ridge WF	346	Miscellaneous Power Plant Equipment	39,107,591	0	0.00%	0	(938,887)	(938,887)	-2.40%		
		Cheyenne Ridge WF - Total/Composite	654,795,885	0		0	(15,720,200)	(15,720,200)	-2.40%	(15,720,200)	
Rush Creek WF	340	Land Rights	0	0	0.00%	0	0	0			
Rush Creek WF	341	Structures and Improvements	0	0	0.00%	0	0	0			
Rush Creek WF	342	Fuel Holders, Producers, and Accessories	0	0	0.00%	0	0	0			
Rush Creek WF	344	Generators	897,481,357	0	-10.00%	0	(17,813,085)	(17,813,085)	-1.98%		
Rush Creek WF	345	Accessory Electric Equipment	18,379	0	-5.00%	0	(365)	(365)	-1.98%		
Rush Creek WF	346	Miscellaneous Power Plant Equipment	0	0	0.00%	0	0	0			
		Rush Creek WF - Total/Composite	897,499,736	0		0	(17,813,450)	(17,813,450)	-1.98%	(17,813,450)	
		Total Wind Production	1,552,295,622	0		0	(33,533,650)	(33,533,650)	-2.16%		
		Total Production	6,828,783,824	1,020,126,298		(134,253,340)	(377,179,530)	(510,249,998)	-7.47%		
PROFORMA SOLAR PRODUCTION											
Arapahoe 5 CSG	341	Structures and Improvements	793,961	317,782	0.00%	0	(73,554)	(73,554)	-9.26%		
Arapahoe 5 CSG	342	Fuel Holders, Producers, and Accessories	0	0	0.00%	0	0	0			
Arapahoe 5 CSG	344	Generators	1,280,582	512,552	0.00%	0	(118,635)	(118,635)	-9.26%	(2)	
Arapahoe 5 CSG	345	Accessory Electric Equipment	332,951	133,263	0.00%	0	(30,845)	(30,845)	-9.26%		
Arapahoe 5 CSG	346	Miscellaneous Power Plant Equipment	153,670	61,506	0.00%	0	(14,236)	(14,236)	-9.26%		
		Arapahoe 5 CSG - Total/Composite	2,561,163	1,025,104		0	(237,270)	(237,270)	-9.26%	(237,270)	
Valmont 9&10 CSG	341	Structures and Improvements	1,644,043	658,027	0.00%	0	(140,315)	(140,315)	-8.53%		
Valmont 9&10 CSG	342	Fuel Holders, Producers, and Accessories	0	0	0.00%	0	0	0			
Valmont 9&10 CSG	344	Generators	2,651,683	1,061,334	0.00%	0	(226,315)	(226,315)	-8.53%	(2)	
Valmont 9&10 CSG	345	Accessory Electric Equipment	689,438	275,947	0.00%	0	(58,842)	(58,842)	-8.53%		
Valmont 9&10 CSG	346	Miscellaneous Power Plant Equipment	318,202	127,360	0.00%	0	(27,158)	(27,158)	-8.53%		
		Valmont 9&10 CSG - Total/Composite	5,303,365	2,122,668		0	(452,630)	(452,630)	-8.53%	(452,630)	
		Total Proforma Solar Production	7,864,529	3,147,772		0	(689,900)	(689,900)	-8.77%		
PROFORMA OTHER PRODUCTION											
Manchief	341	Structures and Improvements	0	0	-20.00%	0	0	0	-5.52%	(2)	
Manchief	342	Fuel Holders, Producers, and Accessories	0	0	-5.00%	0	0	0	-5.52%	(2)	
Manchief	344	Generators	47,187,577	3,969,041	-10.00%	(396,904)	(2,605,375)	(3,002,279)	-6.36%		
Manchief	345	Accessory Electric Equipment	199,678	16,170	-10.00%	(1,617)	(11,025)	(12,642)	-6.33%		
Manchief	346	Miscellaneous Power Plant Equipment	0	0	-10.00%	0	0	0	-5.52%	(2)	
		Manchief - Total/Composite	47,387,255	3,985,212		(398,521)	(2,616,400)	(3,014,921)	-6.36%	(2,616,400)	
		Total Proforma Other Production	47,387,255	3,985,212		(398,521)	(2,616,400)	(3,014,921)	-6.36%		
		Total Proforma Production	55,251,784	7,132,984		(398,521)	(3,306,300)	(3,704,821)	-6.71%		

(1) All Plant balances at December 31,2020 except Proforma which is estimated plant from forecast. Community Solar Gardens (CSG) will be added to plant in 2021 and Manchief will be purchased in 2022.

(2) For Community Solar Gardens (CSG) and Manchief, it is assumed that the overall ratio of dismantling cost to plant cost will be applied to those assets

Exhibit No. XES - 202

Unopposed and Comprehensive Settlement
Agreement (Except as to One Issue), CoPUC
Proceeding No. 21AL-0317E

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

*** * * * ***

**IN THE MATTER OF ADVICE LETTER NO. 1857 –)
ELECTRIC FILED BY PUBLIC SERVICE)
COMPANY OF COLORADO TO REVISE ITS)
COLORADO PUC NO. 8 – ELECTRIC TARIFF TO)
REVISE JURISDICTIONAL BASE RATE) PROCEEDING NO. 21AL-0317E
REVENUES, IMPLEMENT NEW BASE RATES)
FOR ALL ELECTRIC RATE SCHEDULES, AND)
MAKE OTHER PROPOSED TARIFF CHANGES)
EFFECTIVE AUGUST 2, 2021)**

**UNOPPOSED AND COMPREHENSIVE SETTLEMENT AGREEMENT
(EXCEPT AS TO ONE ISSUE)**

I. INTRODUCTION AND IDENTIFICATION OF PARTIES

This Unopposed and Comprehensive Settlement Agreement (Except as to One Issue)¹ (“Settlement Agreement” or “Settlement”) is intended to resolve Public Service Company of Colorado’s (“Public Service” or the “Company”) Advice Letter No. 1857-Electric to place into effect new base rates for all electric service customers. Along with Public Service, the parties to this proceeding include Trial Staff of the Colorado Public Utilities Commission (“Staff”); the Colorado Office of the Utility Consumer Advocate (“UCA”); the City of Boulder (“Boulder”); the City and County of Denver, Colorado (“Denver”); Colorado Energy Consumers (“CEC”); Climax Molybdenum Company (“Climax”); Molson Coors Beverage Company (“Molson Coors”); Colorado Solar and

¹ The Commission’s evaluation of the appropriate approaches to recovering the remaining net book value and future decommissioning costs associated with Craig Generating Station Unit 2 and Hayden Generation Station Units 1 and 2 is reserved for litigation, as discussed in Section III.R of this Settlement Agreement.

Storage Association and Solar Energy Industries Association (collectively “COSSA/SEIA”); Energy Outreach Colorado (“EOC”); Federal Executive Agencies (“FEA”); The Kroger Co. (“Kroger”); Southwest Energy Efficiency Project (“SWEEP”); Vote Solar; Walmart Inc. (“Walmart”); Western Resource Advocates (“WRA”); and Sierra Club (collectively, the “Parties”). As reflected below, each Party either joins in the Settlement or does not oppose it, as follows:

- Public Service, Staff, UCA, CEC, Climax, EOC, FEA, Kroger, Molson Coors, Sierra Club, Walmart, and WRA (“Settling Parties”) join all parts of the Settlement; and
- Boulder, Denver, COSSA/SEIA, SWEEP, and Vote Solar take no position on the Settlement.

This Settlement Agreement is a comprehensive settlement among the Settling Parties, following extensive negotiations involving all Parties, and proposes a resolution of all issues that have been raised or could have been raised in this proceeding except for one. During this proceeding, in Direct, Answer, Rebuttal, and Cross-Answer Testimony, the Settling Parties took different positions on a number of the key revenue requirement, or Phase I, issues, including but not limited to the Company’s proposed test year, valuation of rate base, cost recovery for individual capital projects, the Company’s weighted average cost of capital including return on equity, appropriate level of expenses including operations and maintenance (“O&M”) expense and depreciation expense, adjustments to test year revenue, and ongoing deferrals and amortization of regulatory assets and liabilities. Not all issues involved specific revenue requirement impacts or

determinations. Additionally, some Settling Parties introduced additional requests or recommendations, including proposals related to bill design, the Company's Quality of Service Plan, and certain customer tools.

The Parties represent a wide variety of stakeholders and interests, bringing to the Commission a range of perspectives on the Company's Phase I rate request. This Settlement Agreement represents a compromise among the Settling Parties on all of these issues. The diversity of interests represented in this proceeding helped ensure that this negotiated Settlement Agreement serves the public interest. If approved, this Settlement will result in just and reasonable rates and this Settlement is consistent with Colorado law. Therefore, the Settlement Agreement should be approved by the Commission.

II. BACKGROUND

A. Public Service's 2021 Electric Phase I Filing

1. On July 2, 2021, Public Service filed Advice Letter No. 1857 – Electric ("Advice Letter"). Public Service sought to amend its Colorado P.U.C. No. 8 – Electric tariff to reset the currently effective General Rate Schedule Adjustment ("GRSA") and GRSA-Energy ("GRSA-E") as applied to all base rates currently in effect and make additional tariff changes.

2. In its initial filing, Public Service requested to establish new base rates for Public Service's Electric Department using a future test year ending December 31, 2022, with a requested rate effective date of April 1, 2022, after suspension. Public Service sought a net base rate revenue increase of \$342,954,903 reflecting both expenses and

capital investments, after transferring into base rates the costs of projects previously recovered through the Transmission Cost Adjustment (“TCA”), as well as certain Cheyenne Ridge Wind Project (“Cheyenne Ridge”) costs currently recovered through the Electric Commodity Adjustment (“ECA”). This revenue increase was based on an overall proposed Weighted Average Cost of Capital (“WACC”) of 7.17 percent including a Return on Equity (“ROE”) of 10.00 percent if the future test year was accepted.

3. In addition to the requested change in base rate revenue, including the components of this change, and transferring costs from the TCA and ECA into base rates, through its Advice Letter filing the Company requested Commission approval of updated depreciation rates; approval of the continuation or creation of several trackers and deferrals; amortization of previously-deferred costs; a re-set baseline for the Revenue Decoupling Adjustment to April 1, 2022; extension of the Quality of Service Plan through Performance Year 2024; and approval of certain tariff revisions and the addition of a Resiliency as a Service tariff.

B. Procedural History Relevant to Settlement

4. By Decision No. C21-0422, issued on July 16, 2021, the Commission suspended the effective date of the tariff pages filed with the Advice Letter for 120 days, or through November 30, 2021, pursuant to § 40-6-111(1), C.R.S.

5. By Decision No. C21-0534-I, issued on September 1, 2021, the Commission set a prehearing conference for September 9, 2021 and ordered Public Service to confer with intervenors to determine a procedural schedule to be filed by September 3, 2021.

6. Decision No. C21-0534-I also granted the requests for intervention filed by Kroger, FEA, Denver, SWEEP, CEC, Walmart, Molson Coors, Sierra Club, Boulder, Vote Solar, EOC, COSSA and SEIA, WRA, and Climax. Staff and UCA are intervenors by right.

7. On September 3, 2021, in accordance with Decision No. C21-0534-I, Public Service filed a consensus procedural schedule and provisions for discovery, also requesting that the Commission vacate the prehearing conference if the proposed schedule was satisfactory. Public Service stated that all intervenors supported or took no position on the proposed procedural schedule, provisions for discovery, and proposal to vacate the prehearing conference scheduled for September 9, 2021.

8. In Decision No. C21-0558-I, issued on September 8, 2021, the Commission adopted the consensus procedural schedule that required the filing of Supplemental Direct Testimony on September 28, 2021, Answer Testimony on November 3, 2021, Rebuttal and Cross-Answer Testimony on December 3, 2021, prehearing motions and settlements on or before December 22, 2021, and set an evidentiary hearing for January 11 through 14 and 18 through 21, 2022.

9. On September 28, 2021, Public Service filed Supplemental Direct Testimony on behalf of one witness to provide information requested by the Commission in Decision No. C21-0534-1.

10. On October 27, 2021 the Commission issued Decision No. C21-0670, removing the Company's request for approval of a Resiliency as a Service tariff program from this proceeding without prejudice.

11. On November 3, 2021, eight Intervenor parties, i.e., Staff, UCA, CEC, EOC, FEA, Sierra Club, Walmart, and WRA, filed Answer Testimony on behalf of 23 witnesses. The Intervenor parties took a variety of positions on the Company's direct case, as previously noted, and raised a number of new issues, including recommendations related to the Company's depreciation of certain production facilities, the rate advisor tool, and bill design.

12. On December 3, 2021, the Company filed Rebuttal Testimony from 18 witnesses. Also, on December 3, 2021, five Intervenor parties, i.e., CEC, Denver, EOC, FEA, and WRA, filed Cross-Answer Testimony.

13. In Rebuttal, the Company updated and reduced its requested change in base rate revenue to \$338,466,770 million, after all transfers from either the TCA or ECA to base rates, to reflect certain concessions to reduce the number of contested issues in the case, certain updates, and corrections identified in the proceeding. The Company also updated its base rate present revenue from its initial filing to reflect the Phase II rates approved in Proceeding No. 20AL-0432E.

14. On December 22, 2021, in light of the Parties' intensive and ongoing, productive settlement negotiations, Public Service filed on behalf of all parties an Unopposed Joint Motion for Partial Variance from Decision No. C21-0558-I to Extend the Filing Date of Settlements Until on or Before December 30, 2021 and Request for Waiver of Response Time (Unopposed Motion). In this Motion, the joint movants requested permission to extend the time to reach a settlement until on or before noon on December

30, 2021, and to file a Notice of Settlement and any additional procedural proposals by that time.

15. On December 29, 2021, in Decision No. C21-0836-I, the Commission granted the Unopposed Motion for Partial Variance and gave the parties an extension to noon on December 30, 2021, to file a Notice of Settlement.

16. The Parties thereafter continued settlement negotiations, and ultimately reached a nearly-comprehensive settlement. On December 30, 2021, the Settling Parties filed a Notice of Unopposed Comprehensive Settlement (Except as to One Issue) and Unopposed Motion to Amend the Procedural Schedule and Waive Response Time (“Notice and Motion”). In the Notice and Motion, the Settling Parties requested permission to file the Settlement Agreement and supporting attachments on January 5, 2022, and written testimony in support of the Settlement Agreement from certain parties on January 7, 2022. The Settling Parties also proposed to reduce the evidentiary hearing days from eight to four or fewer, and begin the hearing at 1:00 PM on January 18, 2022, continuing as needed to January 21, 2022.

17. This Settlement Agreement represents a negotiated outcome among the Settling Parties to resolve or provide a framework for resolving all of the outstanding issues that were raised or could have been raised in this Proceeding No. 21AL-0317E, and the Settling Parties agree that the Settlement is in the public interest. All Parties are either Settling Parties or otherwise do not oppose approval of the Settlement.

18. This resulting Settlement Agreement incorporates by reference Attachments 1 - 4, appended hereto, which are identified as follows:

- Attachment 1 – Settlement Test Year Revenue Requirement and GRSA and GRSA-E Summary;
- Attachment 2 – Revenue Requirements for Cheyenne Ridge and TCA Transmission Assets;
- Attachment 3 – O&M Adjustment Detail; and
- Attachment 4 – Bill Impacts.

19. The Settling Parties further anticipate and acknowledge that revisions to Public Service's Colorado PUC No. 8-Electric Tariff ("Electric Tariff") will be necessary to reflect this Settlement Agreement, if approved. The Company anticipates submitting revised tariff sheets as part of a compliance filing upon receipt of a final decision from the Commission.

III. SETTLEMENT TERMS

The Settling Parties agree as follows for settlement purposes:

A. Test Year

20. The Settling Parties agree that the test year is the 12-month period ended December 31, 2021 ("Settlement Test Year").

B. Revenue Requirement and Deficiency

21. Based on all the components of the settled revenue requirement detailed in this Settlement Agreement, the Settling Parties agree to a base rate revenue requirement of \$2,149,469,639. Compared to the Settlement Test Year present revenue of \$1,850,660,946, the resulting base rate revenue change is \$298,808,692.² The

² The final revenue requirement and revenue deficiency may change depending on the outcome of the reserved issue set forth in Section III.R of this Settlement Agreement.

Attachment A – Settlement Agreement
 Proceeding No. 21A-0317E
 Page 9 of 43

components of this revenue requirement are set forth in Attachment 1 to this Settlement Agreement. Attachment 2 sets forth: (a) the portion of the Settlement Test Year revenue requirement associated with Cheyenne Ridge; and (b) the transmission revenue requirement that will be the basis for calculating the TCA beginning with the effective date of rates from this case.

22. Of that base rate revenue increase, \$116,573,274, or approximately 39 percent, of the change in base rate revenue is revenue-neutral to customers as it is associated with the transfer of recovery of transmission investment from the TCA and the Cheyenne Ridge Wind Project revenue requirement from the ECA into base rates, based on currently effective rates. Therefore, the resulting net base rate revenue increase for the Settlement Test Year is \$182,235,418, as set forth in Table 1 below:

**Table 1:
 Revenue Requirement of Items Transferring
 from Rider to Base Rate Recovery**

	Description	Annual Revenue Requirement Being Transferred to Base Rates	Percentage
1	Total Change in Base Rate Revenue	\$ 298,808,692	100%
2	Less:		
3	Cheyenne Ridge	\$ 86,971,620	29.10%
4	TCA Projects	\$ 29,601,654	9.91%
5	Total of Cheyenne Ridge and TCA:	\$ 116,573,274	39.01%
6	Net Change in Base Rate Revenue	\$ 182,235,418	60.99%

23. In settlement of the various issues raised or which could have been raised in this proceeding, the Settling Parties agree that this overall base rate revenue requirement of \$2,149,469,639, and resulting increase of \$298,808,692 over current annual base rate revenue of \$1,850,660,946, are just and reasonable.

24. To recover the base rate revenue deficiency established via this Settlement Agreement, the Company will implement a General Rate Schedule Adjustment (“GRSA”) and GRSA-Energy (“GRSA-E”) effective April 1, 2022, calculated in the manner set forth in the Direct Testimony of the Company. The resulting GRSA and GRSA-E are anticipated to be as set forth in Attachment 1 to this Settlement Agreement.³

25. The anticipated Phase I bill impacts resulting from this Settlement Agreement are set forth in Attachment 4 to this Settlement Agreement.

C. Rate Base Convention and Adjustments

26. The Settlement Test Year revenue requirement is calculated on a 13-month average basis for all plant and plant-related balances included in rate base, with the exception of the Cheyenne Ridge Wind Project revenue requirement, the Wildfire Mitigation Plan (“WMP”), and Advanced Grid Intelligence and Security (“AGIS”) Initiative Certificate of Public Convenience and Necessity (“AGIS CPCN”) projects, which are included in the Settlement Test Year rate base based on a December 31, 2021, year-end basis. Further, the Settling Parties agree that WMP and AGIS CPCN costs will remain

³ As with the overall revenue requirement and revenue deficiency, the final GRSA, GRSA-Es, and bill impacts may change somewhat depending on the Commission's decision with respect to Section III.R of this Settlement Agreement.

the subject of a deferred tracking mechanism with returns as discussed in Sections III.K and L below.

27. With respect to the calculation of rate base, the Settling Parties further agree that:

- a. The Company's plant and plant-related balances included in rate base are based upon the data provided by Company witness Laurie J. Wold in Attachment LJW-2 to her Direct Testimony (Hearing Exhibit 106).
- b. The Settling Parties agree to an overall reduction to gross plant and associated depreciation related to Comanche 3 of \$11.11 million.
- c. The Settling Parties agree that \$1.3 million in insurance deductible costs associated with Comanche 3 will be excluded from the Settlement Test Year revenue requirement.
- d. Cash Working Capital is calculated based on the Settlement Test Year operating expenses multiplied by the cash working capital factors presented in Attachment DAB-12 to the Direct Testimony of Company witness Ms. Deborah Blair (Hearing Exhibit 120).
- e. The Settling Parties agree that the prepaid pension asset and prepaid retiree medical asset will be included in rate base on a 13-month average basis and earn a return at the Company's cost of long-term debt.
- f. The Settling Parties agree that unamortized regulatory asset and liability balances will be afforded the treatment described in Section III.U below.

D. Weighted Average Cost of Capital

The Settling Parties agree that the Company's WACC will consist of:

28. Capital structure and Construction Work in Progress ("CWIP"). Public Service's 13-month average capital structure based on 11 months of actual data (December 2020 through October 2021) and 2 months forecasted data (November and December 2021), which results in 55.69 percent equity, 43.90 percent long-term debt,

and 0.41 percent short-term debt; and the inclusion of CWIP in rate base, as well as an Allowance for Funds Used During Construction (“AFUDC”) offset.

29. Cost of debt. The cost of long-term debt based on the year-end cost as of December 31, 2021, and the cost of short-term debt based on the 13-month average for the Settlement Test Year using 11 months of actual data (December 2020 through October 2021) and 2 months forecasted data (November and December 2021), resulting in a 3.71 percent cost of long-term debt and a 1.79 percent cost of short-term debt.

30. Cost of equity. A cost of equity of 9.30 percent.

31. In sum, the settled WACC is as follows:

Table 2: Settled WACC

	Ratio	Rate	Wtd Cost
Long-Term Debt	43.90%	3.71%	1.63%
Short-Term Debt	0.41%	1.79%	0.01%
Equity	55.69%	9.30%	5.18%
Total Cost			6.82%

E. Capital True-Up

32. The Settling Parties agree to a one-way capital true-up, i.e., if the total actual capital-related revenue requirement through December 31, 2021, is less than projected in the Settlement Test Year, then the Company will reduce the GRSA prospectively to reflect the actual total capital-related revenue requirements and incorporate that difference into the GRSA through a True-up General Rate Schedule Adjustment Advice Letter (“True-Up GRSA Filing”). If the capital-related revenue requirement through December 31, 2021, is higher than projected, that will not trigger a change to the rates established in this proceeding. The Settling Parties agree that the

Company will present the true-up model to Settling Parties at a stakeholder meeting at least two weeks prior to making the True-Up GRSA Filing with the Commission. This True-Up GRSA Filing shall occur by June 1, 2022, with a July 1, 2022, effective date. The adjusted GRSA shall be implemented through the GRSA calculated in the manner set forth in Paragraph III.B.24. This single True-Up GRSA Filing will be a one-time true-up for capital with no further true-up for capital.

F. Test Year Present Revenue

33. The Settling Parties agree to the use of a 10-year weather normalization methodology as proposed by the Company to develop weather-normalized calendar year 2021 revenue (nine months of actual and three months of forecast) to calculate the Settlement Test Year revenue deficiency. After calendar year 2021 concludes, the Company will recalculate the Settlement Test Year revenue deficiency using twelve months of actual 2021 weather-normalized present revenues (“Total Present Revenues”) and, through the True-Up GRSA Filing referenced in Paragraph III.E.32, implement that recalculation prospectively into the GRSA calculated in the manner set forth in Paragraph III.B.24. The single True-Up GRSA Filing will be a one-time true-up for revenue with no further true-up for revenue.

34. The Total Present Revenues will be the Total Present Revenues used in a corresponding Phase II proceeding, if a Phase II proceeding is filed before the Company’s next Phase I electric rate case filing. Nothing in this Settlement regarding the Total Present Revenues is intended to restrict any Party’s ability to make such arguments as

they deem appropriate regarding the class cost allocation, revenue distribution among customer classes, and rate design in any future Phase II proceeding.

G. O&M Expense

35. The Settling Parties agree the Settlement Test Year O&M expense shall be based upon 2020 historical O&M inclusive of known and measurable adjustments through December 31, 2021 (as included in the Company's Informational Historical Test Year attached to the Direct Testimony of Company witness Ms. Deborah A. Blair (Hearing Exhibit 120) as Attachment DAB-3), with the following adjustments:

a. Increased administrative fees paid to the Commission to reflect the assessment factor that was effective July 1, 2021, through June 30, 2022. The baseline amount for the tracker is reflected in Section III.V below.

b. The Settlement Test Year includes approximately \$37.7 million in Comanche 3 O&M, consistent with the discussion in the Rebuttal Testimony of Company witness Mr. Kyle Williams (Hearing Exhibit 130).

c. The Settling Parties agree that Public Service shall recover headcount expenses of approximately \$246,000 in the Transportation Electrification Plan Adjustment ("TEPA") Rider, rather than through base rates as proposed by the Company. Accordingly, the Settlement Test Year revenue requirement excludes these costs, and the Company will incorporate actual 2022 costs in the 2022 TEPA true up advice letter filing and include the 2023 amounts in the 2023 TEPA advice letter filing. The Settling Parties agree to not oppose the implementation of this provision of this Settlement Agreement in the TEPA advice

letter filings, so long as the advice letter filings are consistent with this Settlement Agreement.

d. The Settling Parties agree that for purposes of rates effective on April 1, 2022, the Settlement Test Year revenue requirement shall reflect a 50 percent Settlement Test Year reduction in the Board of Director's equity compensation. Additionally, the revenue requirement shall reflect a 50/50 sharing of oil and gas royalty revenue. Both of these items are subject to the pending litigation in Denver County District Court regarding Proceeding No. 19AL-0268E. If, as a result of that litigation, the Commission's prior decision is reversed and there is less or no sharing of oil and gas royalty revenues, then Public Service may recover the additional oil and gas royalty revenues through the ECA calculated back to the effective date for rates in this proceeding. If, as a result of that litigation, the Company is entitled to additional recovery of the Board of Directors' equity compensation, then the Company may recover the additional expense through the ECA calculated back to the effective date for rates in this proceeding.

e. The Settling Parties agree that the Settlement Test Year revenue requirement shall reflect capping the Company's Annual Incentive Plan ("AIP") expense at 15 percent of base salary, calculated on an employee-by-employee basis. The Settlement Test Year revenue requirement excludes pension expense reflecting AIP compensation above 15 percent of base salary. Public Service agrees to review its AIP metrics to consider using emissions reductions as one of its AIP metrics, and provide testimony on this review in its next Phase I electric

rate case. The Settling Parties further agree that this review is not intended to create any presumptions regarding AIP recovery in a future rate case or limit the arguments the Settling Parties may make regarding this issue in a future Phase I electric rate case.

f. The Settlement Test Year revenue requirement shall reflect the time-based portion of the Company's Long-Term Incentive ("LTI") expense, but not the environmental portion of LTI expense.

g. There is no disallowance in the Settlement Test Year revenue requirement for the Company's Supplemental Incentive Program.

h. The Settlement Test Year revenue requirement retiree medical expense is set at \$0, with the negative expense being recorded as a regulatory liability.

36. Attachment 3 to this Settlement Agreement summarizes and quantifies O&M adjustments in the Settlement Test Year.

H. Rate Case Expenses

37. For purposes of the Settlement Test Year revenue requirements, the Settling Parties agree that rate case expenses the Company is incurring for this proceeding have been adjusted consistent with the Company's rebuttal estimate. At the conclusion of this proceeding, the Company will determine the actual rate case expenses associated with this proceeding. Any difference in Settlement Test Year revenue requirements caused by a difference between these estimated and actual rate case expenses shall be incorporated into the True-Up GRSA Filing identified in Sections III.E

and F. The Company will provide supporting data and receipts regarding actual rate case expenses to Staff prior to the True-Up GRSA Filing. The Settling Parties note that the actual rate case expenses incurred for this proceeding are expected to be lower than the Company's adjusted rebuttal estimate as a result of this Settlement Agreement. The single True-Up GRSA Filing will be a one-time true-up for rate case expenses. The Company will keep track of the recovery of rate case expenses.

38. In addition, actual expenses incurred associated with the following prior proceedings are included in the Settlement Test Year revenue requirement as follows, and will be amortized over a three-year period:

- a. Proceeding No. 20AL-0432E – \$608,411;
- b. Proceeding No. 20A-0204E – \$305,696; and
- c. Proceeding No. 16AL-0048E – \$4,196,232.

I. RDA Baseline Reset

39. The compliance filing advice letter establishing the Settlement GRSA effective April 1, 2022, and the True-Up GRSA advice letter, effective July 1, 2022, will reset RDA baselines.

J. Bad Debt Expense

40. Consistent with the Settlement Agreement in Proceeding No. 21A-0192EG, the Settling Parties agree that the amortization of the COVID-19 bad debt deferral for 2020 and 2021 previously authorized by the Commission in Proceeding No. 20V-0159EG shall be removed from the Settlement Test Year revenue requirement. If there is not a final Commission decision regarding the Settlement Agreement in Proceeding No. 21A-0192EG prior to the Commission's decision in this Proceeding, the Settling Parties agree

that in this proceeding, the Commission should authorize the continuation of the bad debt deferral with no return.

K. Wildfire Management Program Deferral

41. The Settling Parties agree that the Settlement Test Year revenue requirement reflects transferring WMP capital into base rates at the December 31, 2021, year-end value and transferring WMP O&M into base rates as proposed by the Company in the Direct Testimony of Company witness Sandra Johnson (Hearing Exhibit 111). Further, the Settling Parties agree to reset the baseline to December 31, 2021, and continue the deferral of expenses incurred to implement the Company's WMP as approved by the Commission in Proceeding No. 20A-0300E with a return equal to the cost of long-term debt.

L. Advanced Grid Intelligence and Security CPCN Deferral

42. The Settling Parties agree to a continuation of the AGIS CPCN deferral; however, the Company will not begin to apply interest on the deferral until the going forward plant deferred balance reaches \$50 million or greater, and then interest will be applied to the Company's entire balance at an amount equal to the Company's WACC. The Company has been previously authorized in its 2019 Electric Phase I rate case (Proceeding No. 19AL-0268E) to continue the AGIS CPCN deferral at a WACC return through the effective date of new rates in this proceeding; therefore, the Settling Parties agree that the AGIS CPCN deferral threshold will be reset at the effective date of new rates from this proceeding and continue until the effective date of rates in the next Electric Phase I rate case. Nothing precludes the Company from seeking continuation of the

deferral beyond the effective date of rates in the Company's next Electric Phase I rate case.

M. Distributed Intelligence

43. The Settling Parties agree that all DI expenses, totaling approximately \$4.8 million, shall be removed from the Settlement Test Year revenue requirements and that Public Service withdraws its request for deferred accounting of DI expenses within this proceeding, without prejudice.

N. WiMAX Investments

44. The Settling Parties agree that the Settlement Test Year revenue requirement shall include recovery as part of base rates the costs of its Worldwide Interoperability for Microwave Access ("WiMAX") investments.

O. Legacy Meter Recovery

45. The Settling Parties agree that the Company will no longer seek a regulatory asset for legacy meters within this proceeding, but is not precluded in any future proceeding from seeking to establish a regulatory asset for the unrecovered legacy meter costs.

P. Changes in Income Taxes

46. The Settling Parties agree that no new income tax tracker will be established in this proceeding. Nothing in this Settlement precludes any Settling Party from seeking deferred accounting in the future in relation to a change in state or federal corporate income tax rates or provisions between Phase I rate cases.

Q. Depreciation Rates

47. Subject to Section III.R below and without necessarily accepting the Company's methodology, the Settling Parties accept the results of the Company's depreciation study and the associated depreciation rates as presented by Company witness Mr. Dane A. Watson in Direct Testimony, Hearing Exhibit 105.

R. Early Coal Plant Retirements

48. The Settling Parties agree to reserve for litigation and Commission determination the recovery method of decommissioning and early retirement costs associated with early plant closure of Craig Station Unit 2 and the Hayden Generation Station Units 1 and 2.⁴

S. Pension Asset Amortization

49. Public Service agrees to meet with Staff and other interested parties at least twice prior to the filing of its next Phase I electric rate case to discuss methods for eliminating growth in the Company's prepaid pension asset and prepaid retiree medical asset and discuss the long-term plan for elimination of the offsetting regulatory liabilities.

50. The Settling Parties agree that the amortization of the Second Legacy Prepaid Pension Asset as approved in the Company's 2019 Electric Phase I rate case shall continue without extending the amortization period, and the amortization will be reduced by 50 percent of the current level. Thus, the amortization amount will be \$3,125,458 of additional pension expense per year.

⁴ This issue was discussed in Proceeding No. 21A-0141E, the Company's 2021 Electric Resource Plan and Clean Energy Plan ("2021 ERP & CEP"); see e.g. 2021 ERP & CEP Phase I Non-Unanimous Partial Settlement Agreement at 13 (Craig 2), 13-14 (Hayden 1 and Hayden 2).

T. Innovative Clean Technology (“ICT”) Projects

51. The Settling Parties agree that, consistent with the ICT Settlement and the Commission’s decision in Public Service’s 2019 Electric Phase I rate case, Proceeding No. 19AL-0268E, the Company will continue to defer capital costs and O&M expenses through the completion of the projects’ expected battery system lives in 2027, and that the deferral will continue to earn return equal to the Company’s WACC. In addition, the Company will continue to report on the progress of its ICT projects consistent with past practice.

U. Return on Unamortized Balances

52. The Settling Parties agree that the Company shall be permitted to earn the following rates of return on the unamortized balances of regulatory assets:

Asset	Return
AGIS CPCN	WACC return
ICT	WACC return
WMP	Long-Term Debt return
Property tax tracker	No return
Rate case expenses	No return
Pension expense tracker	No return
Gain on sale of assets	No return
EV Make Ready Infrastructure	No return
Colorado Income Tax Change	No return

V. Tracker and Deferral Baselines

53. The Settling Parties agree to implement baseline expense levels in the Settlement Test Year for the current and proposed trackers at the retail level set forth below. Support for the baseline amount for each item will be further detailed in the testimony the Company intends to file in support of the Settlement.

<i>Description</i>	<i>Amount</i>
Property Tax	\$ 176,784,090
Qualified Pension	\$ 14,410,329
Non-Qualified Pension	\$ 676,937
AGIS CPCN O&M	\$ 12,593,321
AGIS CPCN Capital	\$ 15,205,180
Wildfire Mitigation O&M	\$ 6,653,351
Wildfire Mitigation Capital	\$ 3,169,141
Electric CPUC Fees	\$ 11,320,130

W. Other Revenue Requirement Items

54. Any item not addressed or amended in this Settlement Agreement that is an input into the Company's Settlement Test Year revenue requirement model is, for purposes of calculating the revenue deficiency and associated GRSA's and GRSA-E's from the Settlement, accepted as proposed by Public Service in its testimony and attachments without acceptance of any methodology or principle.

X. Effective Date

55. The Settling Parties support an effective date of rates from this proceeding of April 1, 2022, to support the resetting of the AGIS CPCN deferral at the start of the month. Further, the Settling Parties support the Commission's intention of conducting a technical conference in conjunction with its review of the Settlement Agreement.

Y. Tariffs

56. Except as otherwise modified by this Settlement Agreement, the Settling Parties agree to the proposed changes to the Electric tariff, as described in Advice No. 1797 – Electric, and included as clean and redlined versions of the Electric tariff in Attachments SPB-2 (clean) and SPB-3 (redline) to the Direct Testimony of Company witness Steven P. Berman (Hearing Exhibit 102). Any tariff or a portion thereof not addressed or amended in this Settlement Agreement is accepted as proposed by Public Service in its testimony. The Settling Parties agree to cooperate, during the Technical Conference, on any additional tariff changes that may be necessary to effectuate the terms of the Settlement Agreement.

Z. Quality of Service Plan

57. The Settling Parties agree that Public Service's existing electric QSP shall be extended in its current form through 2023 with the following modifications:

- a. The performance threshold value (penalty) for the Customer Complaint metric shall be modified from 8 complaints/1000 customer (or 0.08%) to 6.5 complaints/1000 customer (or 0.065%) measured by the number of premises as of December 31.
- b. The Company will work with Staff and other interested parties on potential modifications to the QSP metrics. These discussions will conclude by April of 2023 and the Company will address these discussions in the next filed QSP extension. At a minimum, the Company will :

- (1) Work with Staff and other interested parties to provide more granular reliability metric reporting with respect to census

group information that reflects services provided to disproportionately impacted communities as defined by HB 21-1266 for reporting in the Company's next QSP beginning in 2024;

- (2) Work with Staff and other interested parties to determine what Advanced Metering Infrastructure meter data may provide the most value to customers for use in potential QSP metrics to be addressed in the Company's next QSP;
- (3) Report without penalties on the changes to the Electric Continuity Threshold and Electric Restoration Threshold metrics proposed in Ms. Ramos' Answer Testimony (Hearing Exhibit 404) for two years, starting with the 2022 Annual QSP to be filed in April 2023 as agreed to in the Company's rebuttal;
- (4) Work with Staff and other interested parties on benchmark reporting of other possible metrics in the 2022 Annual QSP and subsequent QSPs for possible changes and inclusion in those QSPs; and
- (5) Work with Staff and other interested parties on appropriate penalty and reward provisions for new or revised performance-based metrics designed to incentivize incremental improvement which will be filed with the Commission for approval in the next QSP extension in April 2023.

AA. Generation Performance Mechanism

58. The Settling Parties agree that the applicability and design of a potential Generation Performance Mechanism would best be evaluated after the Commission has approved a resource portfolio in the Company's currently pending 2021 ERP & CEP in Proceeding No. 21A-0141E. Therefore, the Settling Parties support the Company's Rebuttal case withdrawal of its proposal.

BB. Cheyenne Ridge Project Evaluation

59. The Settling Parties agree that the Company will address wind performance from the Commercial Operation Date of the Cheyenne Ridge Wind Project through December 31, 2021 in the 2021 ECA Prudence Review filed in August 2022. Upon completion of the 2021 ECA Prudence Review proceeding, the starting point for the five-year wind performance evaluation periods contemplated in the Cheyenne Ridge Settlement Agreement would be January 1, 2022. Evaluation of the Cheyenne Ridge Customer Protection Mechanism (“CPM”) will occur consistent with the Cheyenne Ridge Settlement Agreement’s Timeframe 2 reporting and evaluation process (i.e., following the June 1, 2022 report). Nothing in this provision of the Settlement Agreement will affect any Party’s review or positions taken on the Cheyenne Ridge annual review process(es).

CC. Pension Reporting

60. The Settling Parties agree that the Company will continue its historical pension reporting through the effective date of the Company’s next Phase I electric rate case.

DD. Consolidation of ECA and Purchased Capacity Cost Adjustment (“PCCA”) Prudence Reviews

61. For administrative efficiency, the Settling Parties agree that Public Service shall, on a going forward basis, combine the filing of its ECA and PCCA prudence review applications into a single filing made around the first of August of each year, consistent with the current timing of the ECA prudence review.

EE. Rate Filing Package for Future Rate Cases

62. The Settling Parties agree that the Company and interested stakeholders shall work together to develop a rate filing package and procedures applicable to future Public Service rate cases. The meeting shall occur within six months of the final decision in this case. Issues to be discussed shall include, at a minimum: materials to include in future rate case filings; selection of test year; timing and interplay of Phase I and Phase II proceedings; any proposed use of a GRSA or GRSA-E; and appropriate reporting on capital additions and expenditures both in and between rate cases.

FF. Bill Redesign

63. Public Service commits that in its next compliance filing in the 18M-0072E docket, due January 10, 2022, it shall provide samples demonstrating its bills' compliance with C.R.S. § 40-3-103 and any applicable Commission Rules, as well as a proposed schedule to implement any changes needed to satisfy the applicable statute and rules.

64. The Company commits to conduct customer surveys and other information gathering activities regarding bill design and clarity focused on Residential and Commercial customers. The Company will meet twice with Staff, UCA, and EOC to receive input in creating the customer survey questions. These meetings will begin within thirty (30) days of a final decision in this case and conclude within ninety (90) days of a final decision. Within thirty days (30) after receiving the final survey results, the Company will initiate the process to conduct focus groups. The Company will invite Staff and UCA to observe these focus groups.

65. The Company will request, on or before June 1, 2022, that the Commission establish a miscellaneous docket (M-docket) stakeholder process designed to take written comment from interested parties about: (a) the current bill; and (b) how the Company can improve the bill. The Company will file the final results from the surveys and focus groups into the M-docket with confidentiality designations as necessary.

66. If the Commission does not establish such an M-docket, Public Service commits to meet with Staff and other interested parties within thirty days of the Commission's final decision denying the request to establish an M-docket and create a process to gather the same input.

67. Based on input received from the M-docket or the Company's own information-gathering process, the Company shall track comments received and identify reasonable actions to address complaints raised within those comments. The Company will address immediately any items it can take action on within reasonable timeframes and cost. The Company will file or provide estimated timelines for completion of actions identified in the M-docket or information-gathering process within three months of the conclusion of either process.

68. The Company shall be permitted to track and defer recovery of any costs associated with the stakeholder process, as well as any resulting bill design process and bill changes, for recovery in a future rate case upon demonstration that such costs were prudently incurred.

69. The Company is looking into certain items raised in Staff Witness Mr. Eric Haglund's Answer Testimony (Hearing Exhibit 402), including: addressing inconsistency

between printed paper bills and bills downloaded from online accounts; and correcting the presentation of riders billed as a percentage under Schedule RE-TOU. The Company will report on the status of these items and associated expected implementation date of these two items in its January 10, 2022 filing in Proceeding No. 18M-0072E.

70. The Company further commits to address adjusting the meter reading information table presented on bills for customers taking service under Schedule RE-TOU to move the “total” line to the bottom row. If this cannot be accomplished on or before April 1, 2022, the Company will report back to Staff the expected timeline.

GG. Rate Advisor Tool

71. The Company agrees to incorporate into its Rate Advisor Tool a focus on educating all customers on rate mechanics. The tool will also address and encourage behavioral changes to help ratepayers be successful on their existing rate as opposed to opting out of the TOU rate that is designed to incent more environmentally-conscious usage. The Company also agrees to work with the existing TOU stakeholder group as it develops the tool to incorporate these concerns.

HH. IVVO

72. The Settling Parties agree that Public Service will estimate MWh/MW savings attributable to IVVO in its Distribution System Plan.

II. AGIS Targets

73. Public Service will address the potential opportunity for AGIS-related incremental MWh and/or MW load management targets/benefits as applicable in appropriate planning proceedings which may include Demand-Side Management

Strategic Issues, Renewable Energy Plan, Transportation Electrification Plan, Beneficial Electrification, and Distribution System Planning (“DSP”) proceedings. Public Service will holistically present any incremental targeted AGIS benefits in DSP, but such targets, as relevant, are to be established in individual planning proceedings.

IV. GENERAL PROVISIONS

74. Except as expressly set forth herein, nothing in this Settlement Agreement is intended to have precedential effect or bind the Settling Parties with respect to positions they may take in any other proceeding regarding any of the issues addressed in this Settlement Agreement. No Settling Party concedes the validity or correctness of any regulatory principle or methodology directly or indirectly incorporated in this Settlement Agreement. Furthermore, this Settlement Agreement does not constitute agreement, by any Settling Party, that any principle or methodology contained within or used to reach this Settlement Agreement may be applied to any situation other than the above-captioned proceeding, except as expressly set forth herein.

75. The Settling Parties agree the provisions of this Settlement Agreement, the resulting rates and rate mechanisms, as well as the negotiation process undertaken to reach this Settlement Agreement, are just, reasonable, and consistent with and not contrary to the public interest and should be approved and authorized by the Commission.

76. The discussions among the Settling Parties that produced this Settlement Agreement have been conducted in accordance with Rule 408 of the Colorado Rules of Evidence.

77. Nothing in this Settlement Agreement shall constitute a waiver by any Settling Party with respect to any matter not specifically addressed in this Settlement Agreement.

78. The Settling Parties agree to support, or not oppose, all aspects of the Settlement Agreement embodied in this document in any hearing conducted to determine whether the Commission should approve this Settlement Agreement, and in any other hearing, proceeding, or judicial review relating to this Settlement Agreement, or the implementation or enforcement of its terms and conditions. Each Settling Party also agrees that, except as expressly provided in this Settlement Agreement, it will take no formal action in any administrative or judicial proceeding that would have the effect, directly or indirectly, of contravening the provisions or purposes of this Settlement Agreement. However, except as expressly provided herein, each Settling Party expressly reserves the right to advocate positions different from those stated in this Settlement Agreement in any proceeding other than one necessary to obtain approval of, or to implement or enforce, this Settlement Agreement or its terms and conditions.

79. The Settling Parties do not believe any waiver or variance of Commission rules is required to effectuate this Settlement Agreement but agree jointly to apply to the Commission for a waiver of compliance with any requirements of the Commission's Rules and Regulations, if necessary, to permit all provisions of this Settlement Agreement to be approved, carried out, and effectuated.

80. This Settlement Agreement is an integrated agreement that may not be altered by the unilateral determination of any Settling Party. There are no terms,

representations or agreements among the parties which are not set forth in this Settlement Agreement. This Settlement Agreement may be modified by the Settling Parties so long as any modification is agreed to or unopposed by all Settling Parties, in writing.

81. This Settlement Agreement shall not become effective until the Commission issues a final decision addressing the Settlement Agreement. In the event the Commission modifies this Settlement Agreement in a manner unacceptable to any Settling Party, that Settling Party may withdraw from the Settlement Agreement and shall so notify the Commission and the other Settling Parties in writing within ten (10) days of the date of the Commission order. In the event a Settling Party exercises its right to withdraw from the Settlement Agreement, this Settlement Agreement shall be null and void and of no effect in this or any other proceeding.

82. There shall be no legal presumption that any specific Settling Party was the drafter of this Settlement Agreement.

83. This Settlement Agreement may be executed in counterparts, all of which when taken together shall constitute the entire Agreement with respect to the issues addressed by this Settlement Agreement. This Settlement Agreement may be executed and delivered electronically and the Settling Parties agree that such electronic execution and delivery, whether executed in counterparts or collectively, shall have the same force and effect as delivery of an original document with original signatures, and that each Settling Party may use such facsimile signatures as evidence of the execution and

delivery of this Settlement Agreement by the Settling Parties to the same extent that an original signature could be used.

Dated this 5th day of January, 2022.

Agreed on behalf of:

**PUBLIC SERVICE COMPANY OF
COLORADO**

By: /s/ Brooke A. Trammell
Brooke A. Trammell
Regional Vice President
Rates and Regulatory Affairs
Xcel Energy Services, Inc.
1800 Larimer Street, Suite 1100
Denver, Colorado 80202

Approved as to form:

**ATTORNEY FOR PUBLIC SERVICE COMPANY OF
COLORADO**

By: /s/ Anne Zellner Sherwood
Anne Zellner Sherwood, #44438
Lead Assistant General Counsel
Xcel Energy Services, Inc.
1800 Larimer Street, Suite 1400
Denver, Colorado 80202
Telephone: 303-294-2556
Fax: 303-294-2988
Email: Anne.Sherwood@xcelenergy.com

Attachment A – Settlement Agreement
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Agreed on behalf of:

TRIAL STAFF OF THE COLORADO
PUBLIC UTILITIES COMMISSION

Approved as to form:

PHILIP J. WEISER
Colorado Attorney General

By: /s/ Erin O'Neill

Erin O'Neill
Colorado Public Utilities Commission
Chief Economist, Economics Section
1560 Broadway, Suite 250
Denver, Colorado 80202
Telephone: 303.894.2903
Email: erin.oneill@state.co.us

/s/ Fiona Sigalla

Fiona Sigalla
Colorado Public Utilities Commission
Senior Economist, Economics Section
1560 Broadway, Suite 250
Denver, Colorado 80202
Telephone: 303.894.2729
Email: fiona.sigalla@state.co.us

/s/ Robin Z. Meidhof

Robin Z. Meidhof, 55907*
Deputy Attorney General
Paul J. Kyed, 37814*
First Assistant Attorney General
Michael J. Santisi, *29673
Senior Assistant Attorney General

Counsel for Trial Staff of the
Colorado Public Utilities Commission
*Counsel of Record

Ralph L. Carr Colorado Judicial Center
1300 Broadway, 8th Floor
Denver, Colorado 80203
Telephone: 720.508.6357 (Meidhof)
Telephone: 720.508.6332 (Kyed)
Telephone: 720.508.6330 (Santisi)
robin.meidhof@coag.gov
paul.kyed@coag.gov
michael.santisi@coag.gov

Attachment A – Settlement Agreement
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APPROVED AS TO FORM:

OFFICE OF THE ATTORNEY GENERAL

BY: s/ Gregory E. Bunker

Gregory E. Bunker, Reg. No. 24111

Senior Assistant Attorney General

Thomas F. Dixon, Reg. No. 500

First Assistant Attorney General

Samuel D. Eisenberg, Reg. No. 56961

Assistant Attorney General

Jennifer-Grace Ewa, Reg. No. 49798

Assistant Attorney General

Michel Singer Nelson, Reg. No. 19779

Assistant Attorney General

Office of the Attorney General

1300 Broadway, 7th Floor

Denver, Colorado 80203

(720) 508-6212/ gregory.bunker@coag.gov

(720) 508-6214/ thomas.dixon@coag.gov

(720) 508-6229 / Samuel.eisenberg@coag.gov

(720) 508-6195/ Jennifer.ewa@coag.gov

(720) 508- 6220 / Michel.singernelson@coag.gov

ATTORNEYS FOR THE COLORADO
OFFICE OF THE UTILITY CONSUMER
ADVOCATE

AGREED ON BEHALF OF:

COLORADO OFFICE OF THE UTILITY
CONSUMER ADVOCATE

BY: s/ Cindy Schonhaut

Cindy Schonhaut

Director

Office of the Utility Consumer Advocate

1560 Broadway, Suite 200

Denver Colorado 80202

303-894-2224

cindy.schonhaut@state.co.us

Agreed on behalf of:
Colorado Energy Consumers

s/ Thorvald A. Nelson

Thorvald A. Nelson, Atty. Reg. No. 24715
Michelle Brandt King, Atty. Reg. No. 35048
Austin W. Jensen, Atty. Reg. No. 53782
Holland & Hart LLP
555 Seventeenth Street, Suite 3200
Denver, CO 80202
Telephone: (303) 295-8000
E-Mail: TNelson@hollandhart.com
MBKing@hollandhart.com
AWJensen@hollandhart.com

**ATTORNEYS FOR THE
COLORADO ENERGY CONSUMERS**

RLFanyo Law, LLC

By: /s/ Richard L. Fanyo

Richard L. Fanyo, Reg. No. 7238

RLFanyo Law, LLC

8012 Routt Street

Arvada, CO 80005

Tel: 303-910-4370

Email: rfanyo@rlfanyolaw.com

Attorney for Climax Molybdenum Company

ENERGY OUTREACH COLORADO

By: 
Jennifer Gremmert
Executive Director
Energy Outreach Colorado
225 E. 16th Ave. Suite 200
Denver, CO 80203
Phone: (303) 226-5052
Fax: (303) 825-0765
Email: jgremmert@energyoutreach.org

DIETZE AND DAVIS, P.C.

By: 
Mark D. Detsky, Atty. Reg. No. 35276
Gabriella Stockmayer, Atty. Reg. No. 43770
K.C. Cunilio, Atty. Reg. No. 51378
2060 Broadway, Suite 400
Boulder, CO 80302
Phone: (303) 447-1375
Fax: (303) 440-9036
Email: MDetsky@dietzedavis.com
GStockmayer@dietzedavis.com
KCunilio@dietzedavis.com

ATTORNEYS FOR ENERGY OUTREACH COLORADO

By: 
Maj Scott L. Kirk #20PHV6175
Maj Holly L. Buchanan #21PHV6690
Lt Col Aimee R. Haney #40534
AF/JAOE-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
(850) 283-6347
Scott.Kirk.2@us.af.mil
Holly.Buchanan.1@us.af.mil
Aimee.Haney.1@us.af.mil
Org Box Email: ULFSC.Tyndall@us.af.mil

ATTORNEYS FOR FEDERAL EXECUTIVE AGENCIES

Attachment A – Settlement Agreement
Proceeding No. 21A-0317E
Page 39 of 43

By: /s/ Kurt J. Boehm
Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
office: 513-421-2255
mobile: 513-290-6683
fax: 513-421-2764

Attorney for The Kroger Co.

By: /s/ Mark T. Valentine

1580 Lincoln Street, Suite 1105

Denver, CO 80203^[L]_[SEP]

Tel: 303-908-9391^[L]_[SEP]

Email: mvalentine@keyesfox.com

Attorneys for Molson Coors Beverage Company

/s/ Matthew Gerhart

Matthew Gerhart
Senior Attorney
Sierra Club Environmental Law Program
1536 Wynkoop St., Suite 200
Denver, Colorado, 80202
(303) 454-3346
matt.gerhart@sierraclub.org

ATTORNEY FOR SIERRA CLUB

FLEGE ENERGY LAW, LLC

/s/ Jeffrey S. Flege

Jeffrey S. Flege, #42846
3132 Troy Street
Aurora, CO 80011
Tel: (720) 996-1606
jeffrey.flege@flegelaw.com

CLARK ENERGY LAW, LLC

/s/ Julie A. Clark

Julie A. Clark, #45073
3440 Youngfield Street, Suite 276
Wheat Ridge, CO 80033
Tel: (303) 731-6106
jclark@clarkenergylaw.com

ATTORNEYS FOR WALMART INC.

WESTERN RESOURCE ADVOCATES

/s/ Ellen Howard Kutzer
Ellen Howard Kutzer, #46019, Senior Staff Attorney
Parks J. Barroso, #55468, Staff Attorney
Gwendolyn Farnsworth, Managing Senior Policy Advisor
Western Resource Advocates
2260 Baseline Rd. Suite 200
Boulder CO 80302
720-763-3710
303-786-8054 (fax)
ellen.kutzer@westernresources.org
parks.barroso@westernresources.org
gwen.farnsworth@westernresources.org

Exhibit No. XES - 203

CoPUC Decision Approving Settlement,
Proceeding No. 21AL-0317E

Decision No. C22-0178

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 21AL-0317E

IN THE MATTER OF ADVICE LETTER NO. 1857 - ELECTRIC FILED BY
PUBLIC SERVICE COMPANY OF COLORADO TO REVISE ITS COLORADO
PUC NO. 8 - ELECTRIC TARIFF TO REVISE JURISDICTIONAL BASE RATE
REVENUES, IMPLEMENT NEW BASE RATES FOR ALL ELECTRIC RATE
SCHEDULES, AND MAKE OTHER PROPOSED TARIFF CHANGES TO BECOME
EFFECTIVE AUGUST 2, 2021.

**DECISION APPROVING SETTLEMENT, PERMANENTLY
SUSPENDING TARIFFS, ESTABLISHING RATES,
REQUIRING COMPLIANCE FILINGS, AND ORDERING
THE FILING OF A PHASE II RATE CASE**

Mailed Date: March 24, 2022
Adopted Date: March 16, 2022

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I. BY THE COMMISSION

A. Statement

1. This Decision grants the Unopposed Motion to Approve Unopposed and Comprehensive Settlement Agreement (Except as to One Issue) and Request for Waiver of Response Time (Motion to Approve Settlement) and approves the Unopposed and Comprehensive Settlement Agreement (Except as to One Issue) filed on January 5, 2022 by

Public Service Company of Colorado (Public Service or Company), Staff of the Commission (Staff), the Office of the Utility Consumer Advocate (UCA) (formerly the Office of Consumer Counsel), Colorado Energy Consumers, Climax Molybdenum Company (Climax), Molson Coors USA LLC (Molson Coors), Energy Outreach Colorado (EOC), Federal Executive Agencies (FEA), Kroger Co. (Kroger), Sierra Club, Wal-Mart Stores, Inc. (Walmart), and Western Resource Advocates (WRA). This Decision permanently suspends the effective date of the tariff sheets for rates filed by Public Service with Advice Letter No. 1857-Electric on July 2, 2021. The Commission instead establishes new rates that Public Service shall implement in accordance with this Decision.

2. In accordance with the findings and conclusions below, the Commission authorizes Public Service to increase its base rate revenues through a modified General Rate Schedule Adjustment (GRSA)—for incremental base rate cost recovery on an energy basis from residential and small commercial rate classes—or through a combination of a traditional GRSA, expressed as a percentage increase to all existing base rate components, and a General Rate Schedule Adjustment-Energy (GRSA-E), expressed on an energy basis—for incremental base rate cost recovery from all other customer rate classes. The increase in base rate revenues shall be the net of the “roll-ins” of certain costs presently recovered through separate rate adjustment mechanisms.

3. The Commission directs Public Service to make a compliance tariff filing on not less than two days’ notice to implement the GRSA, GRSA-E, and other revised tariff provisions to reflect the Settlement in this Proceeding. Public Service shall also include in the compliance filing, a reset of the Revenue Decoupling Adjustment (RDA) baseline.

4. The Commission further directs Public Service to make a filing on or before June 1, 2022 for a July 1, 2022 effective date, reflecting the true-up of the Settlement Test Year revenue requirement, if necessary to implement the terms of the Settlement.

5. We further direct Public Service to file a Phase II rate case no later than six months following the effective date of this Decision.

B. Procedural Background

6. On July 2, 2021, Public Service filed Advice Letter No. 1857-Electric with supporting attachments and pre-filed testimony as a Phase I rate proceeding. The proposed effective date of the tariffs filed with Advice Letter No. 1857 was August 2, 2021. However, Public Service stated that it anticipated the tariffs would be suspended and set for hearing, in which case, the Company requested an effective date of April 1, 2022.

7. With Advice Letter No. 1857, Public Service seeks an overall increase in base rate revenue of about \$469.7 million above its current base rate revenue of \$1,828.7 million, an increase of about 26 percent. Public Service states that the increase is necessary because it has made and will continue to make extensive capital investments in its system.

8. The proposed increase includes a transfer into base rates of \$38.8 million previously recovered through the Transmission Cost Adjustment (TCA) and \$87.9 million in Cheyenne Ridge Wind Project costs currently collected through the Electric Commodity Adjustment (ECA). The transfer of these costs into base rates would be revenue neutral to customers, so the net base revenue increase requested is \$343 million, resulting in a monthly average Residential and Commercial bill increase of nearly 13 percent.

9. Public Service based its requested increase on a future test year ending December 2022, with an overall rate of return of 7.17 percent and a return on equity (ROE) of 10.00 percent.

10. In addition to the change in base rate revenue, Public Service requests approval of updated depreciation rates, approval of trackers and deferrals, a re-set of the baseline for the RDA, and an extension of its Quality-of-Service Plan (QSP) through 2024.

11. By Decision No. C21-0422, issued on July 16, 2021, the Commission suspended the effective date of the tariff pages filed with Advice Letter No. 1857 for 120 days, or through November 30, 2021, pursuant to § 40-6-111(1), C.R.S.

12. By Decision No. C21-0534-I, issued on September 1, 2021, the Commission granted the requests for intervention filed by Kroger; FEA; City and County of Denver (Denver); Southwest Energy Efficiency Project (SWEEP); Colorado Energy Consumers Group (CEC); Walmart; Molson Coors; Sierra Club; City of Boulder (Boulder); Vote Solar; EOC; jointly, Colorado Solar and Storage Association (COSSA) and Solar Energy Industries Association (SEIA); Climax, and WRA. Staff, UCA, and Colorado Energy Office are intervenors by right.

13. By Decision No. C21-0558-I, issued on September 8, 2021, the Commission established a procedural schedule for this Proceeding, including setting December 22, 2021, as the deadline for filing settlements and setting the commencement of an evidentiary hearing on January 11, 2022. The Commission also suspended the tariff pages filed with Advice Letter No. 1857 an additional 130 days, that is, through April 9, 2022, pursuant to § 40-6-111(1)(b), C.R.S.

14. Answer Testimony was filed on November 3, 2021, by Staff, UCA, FEA, CEC, Walmart, Sierra Club, and EOC.

15. On December 3, 2021, Public Service filed Rebuttal Testimony and Denver, EOC, WRA, FEA, and CEC filed Cross Answer Testimony.

16. On December 22, 2021, Public Service filed an Unopposed Motion for Partial Variance from Decision No. C21-0558-I to Extend the Filing Date of Settlements Until on or Before December 30, 2021 (Motion to Extend Settlement Filing Date), requesting modification of the procedural schedule to allow a Notice of Settlement, a proposal for filing a settlement agreement, and any supporting testimony by December 30, 2021.

17. By Decision No. C21-0836-I, issued on December 29, 2021, the Commission granted the Motion to Extend Settlement Filing Date allowing a Notice of Settlement to be filed by December 30, 2021.

18. On December 30, 2021, Public Service, on behalf of the Parties to this Proceeding filed a Notice of Unopposed Comprehensive Settlement (Except as to One Issue) and Unopposed Motion to Amend the Procedural Schedule and Waive Response Time (Notice and Motion). Through the Notice and Motion, the Parties stated they had reached a settlement on all issues except the recovery method of decommissioning and early retirement costs associated with the early plant closure of Craig Station Unit 2 and Hayden Generation Station Units 1 and 2. The Parties also requested modification to the procedural schedule, setting January 5, 2022, as the deadline to file a settlement, holding a hearing on January 18 through 21, 2022, and vacating additional hearing dates.

19. By Decision No. C22-0016-I issued January 5, 2022, the Commission granted the request to modify the procedural schedule to allow a settlement to be filed on January 5, 2022. However, the Commission declined to vacate additional hearing dates until the Commission

could review any settlement that would be filed. The hearing dates of January 11 and 12, 2022 were vacated and a prehearing conference was held on January 12, 2022.

20. On January 5, 2022, Public Service, Staff, UCA, CEC, Climax, Molson Coors, EOC, FEA, Kroger, Sierra Club, Walmart, and WRA (collectively, Joint Movants) filed an Unopposed Motion to Approve Unopposed and Comprehensive Settlement Agreement (Except as to One Issue) and Request for Waiver of Response Time with the Unopposed and Comprehensive Settlement Agreement (Except as to One Issue) as an attachment. The Joint Movants state that the remaining parties, Denver, Boulder, COSSA, SWEEP, SEIA, and Vote Solar do not oppose the Motion or the Settlement.

21. By Decision No. C22-0040, issued on January 14, 2022, the Commission vacated the hearing dates of January 13 and 14, 2022 and set January 18, 2022, as the first day of the evidentiary hearing. The Commission also directed Public Service to revise Attachment LJW-10 to include the net present value of total revenue requirements through 2035 for the accelerated depreciation and regulatory asset cost recovery approaches for the retirement of Craig Station Unit 2 and Hayden Station Units 1 and 2.

22. On January 18, 2022, the Commission commenced the evidentiary hearing *en banc*. The evidentiary hearing concluded on that day.

23. On January 19, 2022, a public comment hearing was held *en banc* via Zoom to receive oral comment from the public.

24. On February 11, 2022, Statements of Position (SOPs) were filed by CEC, Climax, Denver, FEA, Sierra Club, Staff, UCA, and Public Service.

25. The Commission initiated its deliberations adopting this Decision at the Commissioner Weekly Meeting on March 16, 2022.

A. Summary of Findings and Conclusions

26. We have carefully reviewed the extensive evidentiary record in this Proceeding, mindful of the public comments submitted in writing and offered orally at a public comment hearing. Based on this review, our consideration of the SOPs filed by Public Service and the intervening parties, and our deliberations on March 16, 2022, we grant the Unopposed Motion to Approve Settlement and approve the Settlement, establishing rates to recover Public Service's base rate revenue requirement that will cover the Company's expenses and provide the Company a reasonable opportunity to earn a fair rate-of-return.

II. LEGAL FOUNDATION AND BURDENS OF PROOF

27. The Commission is the agency charged with the duty of regulating the rates of public utilities within Colorado.¹ A key part of that duty is ensuring that rates and charges for utility service are just and reasonable and not excessive or unduly discriminatory.² Further, § 40-3-101(2), C.R.S., requires a utility to furnish, to provide, and to maintain such service, instrumentalities, equipment, and facilities as shall promote the safety, health, comfort, and convenience of its patrons, employees, and the public, and as shall in all respects be adequate, efficient, just, and reasonable.

28. The establishment of just and reasonable rates involves a balancing of investor and consumer interests.³ As regards the utility, to be just and reasonable, rates must generate

¹ See § 40-3-102, C.R.S.; Colo. Const. Art. XXV.

² See § 40-3-101(1), C.R.S.; *Cottrell v. City & County of Denver*, 636 P.2d 703 (Colo. 1981).

³ *Pub. Serv. Co. of Colo. v. Pub. Utils. Comm'n.* 644 P.2d at 939 (Colo. 1982).

revenues sufficient to meet the utility's cost of furnishing services, and provide its investors with a fair and reasonable return on their investments.⁴ The Commission must ensure that the utility has adequate revenues for operating expenses and to cover the capital costs of doing business.⁵ The revenues must be sufficient to assure confidence in the financial integrity of the utility, in order to maintain its credit and attract capital.⁶ As regards to ratepayers, the Commission is charged with protecting the interest of the general public from excessive, burdensome rates.⁷ The Commission must determine that rates are just and reasonable and that services provided "promote the safety, health, comfort and convenience of its patrons, employees, and the public," and are in all respects adequate, efficient, just, and reasonable.⁸

29. When it comes to settlements, it is the proponents of an order approving the settlement that bear the burden of proof to establish by a preponderance of the evidence that the settlement is just and reasonable and in the public interest.⁹ In determining whether to approve a settlement, the Commission carefully balances the longstanding policy of encouraging settlements in contested cases¹⁰ and the Commission's independent duty to determine whether matters are in the public interest.¹¹ The Commission does not necessarily need to find the settled terms are the same as the Commission would have reached; rather, the Commission considers

⁴ *Federal Power Commission v. Hope Natural Gas Co*, 320 U.S. 591 (1944); *Bluefield Water Works and Improvement Co. v. Public Service Company*, 262 U.S. 679 (1923). See also, *Peoples Natural Gas Div. of N. Natural Gas Co. v. Pub. Utils. Comm'n.*, 567 P.2d 377 (Colo. 1977).

⁵ *Pub. Utils. Comm'n. v. District Court*, 527 P.2d 233 (Colo. 1974).

⁶ *Id.*

⁷ *Id.*

⁸ *Id.*

⁹ Section 24-4-105(7), C.R.S.; § 13-25-127(1), C.R.S.; Rule 1500 of the Commission's Rules of Practice and Procedure, 4 *Code of Colorado Regulations* (CCR) 723-1.

¹⁰ See, e.g., Rule 1408 of the Commission's Rules of Practice and Procedure, Rule 4 CCR 723-1.

¹¹ *Caldwell v. Pub. Utils. Comm'n.*, 692 P.2d 1085, 1089 (Colo. 1984).

whether the settled terms adequately address the issues raised in the proceeding and reach a result that is just and reasonable and in the public interest.

III. SETTLEMENT

30. Through the Motion to Approve Settlement, the Joint Movants state that the Settlement resolves all issues except for the recovery of remaining net book value and future decommissioning costs associated with Craig Generating Station Unit 2 and Hayden Generation Station Units 1 and 2. The Settlement specifically addresses: (1) Public Service's revenue requirement and deficiency; (2) the test year and Public Service's rate base methodology; (3) Public Service's weighted average cost of capital (WACC); (4) Public Service's test year revenue; (5) a one-way capital true-up; (6) Public Service's test year operation and maintenance (O&M) expenses; (7) rate case expenses; (8) bad debt expenses; (9) wildfire and Advanced Grid Intelligence and Security (AGIS) deferrals; (10) engagement to undertake an assessment of Public Service's bill design and potential re-design; (11) depreciation rates; (12) other test year adjustments; (13) other regulatory assets; (14) additional existing trackers and deferrals; (15) QSP extension; (16) rate filing package for future rate cases; and (17) rate implementation and tariff changes.

A. Test Year, Revenue Requirement, and Rate Base

31. The Settling Parties agree to a test year of the 12-month period ended December 31, 2021 (Settlement Test Year). The revenue requirement is calculated on a 13-month average rate base, with the exception of Cheyenne Ridge Wind Project, Wildfire Mitigation Plan (WMP), and AGIS Certificate of Public Convenience and Necessity (CPCN), which are included on a year-end basis. The base revenue requirement is calculated at \$2,149,469,639, resulting in a revenue deficit of \$298,808,692. As part of this revenue deficit

calculation, the Settling Parties agreed to roll into base rates \$29,601,654 currently being recovered through the TCA and \$86,971,620 of costs associated with the Cheyenne Ridge Wind Project currently recovered through the ECA. The net base rate revenue increase requested in the Settlement is \$182,235,418.

32. Additionally, in calculating rate base, the Settlement allows for an \$11.11 million reduction in gross plant and associated depreciation related to Comanche 3 and the exclusion of \$1.3 million in insurance deductible costs associated with Comanche 3. The prepaid pension asset and prepaid retiree medical asset are included on a 13-month average basis and will earn a return equal to the Company's long-term cost of debt.

B. Capital Structure and Weighted Average Cost of Capital

33. The Settlement allows for a WACC of 6.82 percent, using a capital structure of 55.69 percent equity, 43.90 percent long-term debt, and 0.41 percent short-term debt. The settled ROE is 9.30 percent, the cost of long-term debt is 3.71 percent, and the cost of short-term debt is 1.79 percent.

34. The calculation of the WACC is based on 11 months of data from December 2020 through October 2021 and 2 months of forecasted data for November and December 2021. Construction Work in Progress is included in rate base, with an offset for Allowance for Funds Used During Construction.

C. Bill Impact

35. Under the terms of the Settlement, the base rate deficiency will be recovered through both a GRSA and a GRSA-E effective April 1, 2022. This results in an increase of \$5.24 (6.44 percent) in the average monthly Residential bill, and an increase of \$6.64 (6.24 percent) in the average monthly Commercial bill. Secondary, Primary, and Transmission customers will see

increases in average bills of \$124.00 (5.88 percent), \$1,913 (5.32 percent), and \$20,278 (4.67 percent), respectively.

D. Capital True-Up and Test Year Revenue

36. The Settlement allows for a one-way capital true-up to be conducted prior to June 2022. If the capital-related revenue requirement through December 31, 2021 is less than that projected in the Settlement Test Year, Public Service will make a filing by June 1, 2022 to adjust the GRSA (True-Up GRSA Filing) with an effective date of July 1, 2022. A capital-related revenue requirement that is higher than projected in the Settlement Test Year will not result in a true-up.

37. Additionally, the Settlement Test Year revenue is based on a ten-year weather normalization using nine months of 2021 data and three months of forecast data. At the conclusion of 2021, Public Service will recalculate the Settlement Test Year revenue deficiency with 12 months of actual weather-normalized present revenues (Total Present Revenues) and include that calculation in the True-Up GRSA Filing. The Total Present Revenues will be used in a Phase II filing if such a proceeding is filed before Public Service files its next Phase I electric rate case.

E. O&M Expenses

38. The Settlement Test Year O&M expenses are based on 2020 historical O&M, including known and measurable adjustments through December 31, 2021. Adjustments are made to reflect the increased assessment factor effective July 1, 2021 through June 30, 2022 for the administrative fees paid to the Commission and \$37.7 million in the Comanche 3 O&M. The Settlement Test Year revenue requirement reflects a 50 percent reduction in the Board of Directors' equity compensation and a 50/50 sharing of oil and gas royalty revenues.

39. The Settlement Test Year revenue requirement reflects a 15 percent cap on the Annual Incentive Plan expense, which will be calculated on an employee-by-employee basis; and includes the time-based portion of the Long-Term Incentive expense, but excludes the environmental portion of that expense. The Supplemental Incentive Program is included without disallowance and the retiree medical expense is set at \$0 with the negative expense recorded as a regulatory liability.

40. Headcount expenses of some \$246,000 are excluded from the Settlement Test Year and will be recovered in the Transportation Electrification Plan Adjustment.

F. Rate Case Expenses

41. Rate case expenses for this Proceeding will be recalculated at the conclusion of the Proceeding with any difference between the estimated expenses included in the Settlement Test Year and actual expenses incorporated into the True-Up GRSA Filing. Additionally, expenses from previous proceedings are included in the Settlement Test Year as follows:

Proceeding No. 20AL-0432E	\$ 608,411
Proceeding No. 20A-0204E	305,696
Proceeding No. 16AL-0048E	4,196,232

G. Bad Debt Expenses

42. A settlement was filed in Proceeding No. 21A-0192EG on October 25, 2021, that allows for the amortization of the COVID-19 bad debt deferral for 2020 and 2021 (authorized in Proceeding No. 20V-0159EG¹²) to be removed from the Settlement Test Year revenue requirement. If a final Commission decision regarding that settlement is not issued prior to the Commission's decision in this Proceeding, the Settling Parties in this Proceeding request Commission authorization for continuation of bad debt deferral with no return.

¹² See Decision No. R20-0597 issued August 14, 2020.

H. Wildfire Management Program

43. The Settlement Test Year revenue requirement includes the transfer of WMP O&M and capital base rates at the December 31, 2021 year-end value. The baseline is reset to December 31, 2021 and expenses will continue to be deferred with a return equal to the Company's long-term cost of debt authorized in Proceeding No. 20A-0300E.

I. Advanced Grid Intelligence and Security CPCN Deferral

44. The AGIS CPCN deferral will continue but Public Service will not apply interest on the deferral until the going-forward plant deferred balance reaches \$50 million. At that point, the entire balance will incur interest at an amount equal to Public Service's WACC. The deferral threshold will be reset at the effective date of the new rates in this Proceeding and continue until the new rates are effective in the Company's next Phase I rate case.

J. Additional Adjustments to the Settlement Test Year

45. Distributed Intelligence expenses of about \$4.8 million are removed from the Settlement Test Year revenue requirements, but recovery of Worldwide Interoperability for Microwave Access investments is allowed as part of the base rates.

K. Pension Asset Amortization

46. Through the Settlement, Public Service agrees to meet with Staff and interested parties at least twice before filing its next Phase I electric rate case to discuss methods for eliminating growth in the prepaid pension asset and prepaid retiree medical asset, and to discuss the long-term plan for elimination of the offsetting regulatory liabilities.

47. The amortization of the Second Legacy Prepaid Pension Asset as approved in Proceeding No. 19AL-0268E will continue without extending the amortization period and the amortization will be reduced by 50 percent of the current level.

L. Innovative Clean Technology Projects

48. Public Service will continue to defer capital costs and O&M expenses for Innovative Clean Technology Projects (ICT) projects, consistent with the ICT Settlement and as authorized in Proceeding No. 19AL-0268E. This deferral will continue through the projects' expected battery system lives in 2027 and will earn a return equal to Public Service's WACC.

M. Return on Unamortized Balances

49. The Settlement allows for no return on the following regulatory assets: property tax tracker, rate case expenses, pension expense tracker, gain on sale of assets, EV Make Ready Infrastructure, or Colorado Income Tax Change. The AGIS CPCN and ICT regulatory assets are allowed a return equal to WACC and the WMP is allowed a return equal to the long-term cost of debt.

N. Quality of Service Plan

50. The Settlement allows the continuation of Public Service's QSP through 2023, with certain modifications. Public Service will work with Staff on modification to QSP metrics, with discussions concluding by April 2023.

O. Consolidation of ECA and Purchased Capacity Cost Adjustment

51. The Settlement allows for combining the ECA and Purchased Capacity Cost Adjustment (PCCA) prudence review applications into a single filing to be made at the beginning of august each year.

P. Rate Filing Package for Future Rate Cases

52. Public Service and stakeholders will work together prior to the next filed rate case to develop a rate filing package and procedures. The first meeting will occur within six months of the final Commission decision in this case and will include discussion of materials to include

in future rate case filings, test year, timing of Phase I and Phase II filings, use of GRSA or GRSA-E, and reporting on capital additions and expenditures in and between rate cases.

Q. Bill Redesign

53. Public Service commits to making appropriate filings regarding its bills as required in Proceeding No. 18M-0072E demonstrating compliance with applicable statute and rules. Additionally, the Company will conduct customer surveys and gather information regarding bill design and will meet twice with Staff, UCA, and EOC to receive input for creation of the survey questions.

54. On or before June 1, 2022, Public Service will request the Commission establish a miscellaneous proceeding to take comment on bill design and potential design improvements. If the Commission declines to open a miscellaneous proceeding, Public Service will meet with Staff and interested parties to establish a process for gathering bill design information.

R. Rate Advisor Tool

55. Public Service will incorporate into its Rate Advisor Tool, a focus on educating customers on rate mechanics. It will address and encourage behavioral changes to allow customers to remain on time of use rates rather than opting out.

S. IVVO

56. Public Service will estimate MWh/MW savings attributable to Integrated Volt-Var Optimization (IVVO) in its Distribution System Plan.

T. AGIS Targets

57. Public Service will address the potential opportunity for AGIS-related incremental MWh and/or MW load management targets/benefits as applicable in appropriate planning proceedings which may include Demand-Side Management Strategic Issues, Renewable Energy

Plan, Transportation Electrification Plan, Beneficial Electrification, and Distribution System Planning (DSP) proceedings. Public Service will holistically present any incremental targeted AGIS benefits in DSP, but such targets, as relevant, are to be established in individual planning proceedings.

U. Findings and Conclusions

58. We find that the Settlement is in the public interest, and is just, reasonable, and not discriminatory. We find that the settled overall base rate revenue requirement of \$2,149,469,639, reflecting an increase of \$ 298,808,692 over current annual base rate revenues, and which is significantly less than the revenue requirement originally requested by Public Service, is a reasonable amount that finds support in the record. We also find that the settled ROE of 9.3 percent, which is the same ROE currently authorized by Decision No. C20-0096¹³ in Proceeding No. 19AL-0268E, is supported by the record in this Proceeding and is within the range of ROEs suggested by the parties. Taken as a whole, the Settlement reflects a reasonable compromise between the parties that will result in just and reasonable rates. We therefore conclude that the Settlement is in the public interest and approve the Settlement without modification.

IV. CRAIG AND HAYDEN RETIREMENT COSTS

A. Positions of the Parties

59. In its initial filings in this Proceeding, Public Service made no requests regarding special cost recovery for the coal generation units it plans to retire pursuant to its Clean Energy Plan under review by the Commission in the Company's Electric Resource Plan (ERP) Proceeding (Proceeding No. 21A-0141E). However, in Answer Testimony, Staff pointed to the

¹³ Decision No. C20-0096 was issued in Proceeding No. 19AL-0268E on February 11, 2020.

ongoing ERP Proceeding, where the Company proposes to accelerate the retirement of Craig 2 from 2039 to 2028, Hayden 1 from 2030 to 2028, and Hayden 2 from 2036 to 2027. Staff recommended the Commission immediately adjust depreciation of the Craig and Hayden plants in the rate case. Staff argued that although accelerated depreciation would increase rates to collect more dollars today so that the asset is fully depreciated at the new retirement date, the approach would benefit Public Service with increased cash flow and improved credit metrics and would be in the public interest so that the costs would be recovered from the ratepayers that receive the benefit of the plants in the form of generated electricity.

60. In Rebuttal Testimony, Public Service responded to Staff's proposal, recommending that the Commission instead approve a regulatory asset approach, with an amortization of costs over seven years and with a full return. Public Service argues that this approach has the effect of moderating rate impacts to customers, so that the cost of retiring the coal units is reasonable. Public Service further contends that the policy question in deciding accelerated depreciation versus the regulatory asset approach is not "which customers are using the generation, but who is benefiting from the early retirements."¹⁴

61. The Company's Rebuttal Testimony was filed after the Company, Staff, and certain additional parties in the ERP Proceeding had reached settlement in that case. One term of that agreement is that the Settling Parties request the Commission to evaluate in this rate case "two approaches to recovering the remaining net book value and future decommissioning costs: (1) accelerated depreciation; and (2) the regulatory asset approach with a full return with an amortization period to be determined in the rate case."¹⁵

¹⁴ See Hrg. Exh. 123 (Trammell Rebuttal) at 58:7-8.

¹⁵ Non-Unanimous Partial Settlement Agreement, filed November 24, 2021, in Proceeding No. 21A-0141E, ¶¶ 25 and 26. (Footnote 13 omitted)

62. In its SOP, Public Service requests the Commission authorize Public Service to create a regulatory asset with a seven-year amortization period to recover the undepreciated balances of each plant, along with decommissioning and dismantling costs. Public Service justifies the regulatory asset approach for Craig and Hayden in the context of overall future rate impact considerations that include the costs of retiring the Comanche 3 coal unit on an earlier schedule (*i.e.*, in 2034 pursuant to the ERP Proceeding settlement). The Company further argues that the WACC return on the amortization amounts is necessary to account for the carrying costs associated with recovering the depreciation and removal costs over a longer period of time. The Company also stresses the cost certainty for customers that comes from deciding the issue now in this Proceeding.

63. Public Service also addresses the Commission's interest in examining securitization for the Hayden and Craig units, including a "packaged securitization." Public Service argues that Colorado's securitization statute is "volitional for the utility."¹⁶ Public Service states that it does not support such an outcome either in this Proceeding or in the ERP Proceeding. The Company further argues that securitization would require additional administrative, financing, and transaction costs that would not add a benefit to either customers or the Company. Such costs are estimated at potentially \$10 million to obtain regulatory approvals and to issue the securities through a process that could take at minimum of two years.

64. In its SOP, Staff recommends the Commission approve accelerated depreciation. Staff argues that pushing the depreciation costs for these units further into the future exacerbates pancaking of future costs over the next several years. Staff also argues that failure to collect full

¹⁶ Public Service cites § 40-41-103(1), C.R.S., that states: "[a]n electric utility, *in its sole discretion*, may apply to the commission for a financing order as authorized by this section" (emphasis added by Public Service).

depreciation from today's ratepayers raises the total revenue requirement by \$42.2 million compared to adjusting depreciation schedules for the life of the asset, including \$34 million of additional returns. Staff also warns that Public Service's cost estimates for the regulatory asset are unstable, noting that such costs increased by over 20 percent during the course of the rate case proceeding. Staff further characterizes the regulatory asset approach as "deliberately under-depreciating the power plants" for "effectively deficit financing the investment or, in other terms, putting expenses on a credit card that will accrue interest for six to seven years before repayment begins. And future ratepayers who are not receiving electricity from the newly shuttered plants will be asked to pay this debt, with interest."¹⁷

65. Regarding securitization, Staff argues that the securitization option should be vetted with a full understanding of ratepayer costs and states, echoing Public Service, that Colorado's statute addressing securitization financing requires the utility to formally request authorization. Staff argues that neither condition has yet been satisfied. Staff further argues that the applicability of securitization provisions in Senate Bill 21-272 did not apply to the latest ERP Proceeding because the Company filed its ERP on March 31, 2021, well in advance of June 24, 2021 when the 2021 statute took effect.

66. CEC, Climax, and Sierra Club each argue that it is unnecessary for the Commission to decide cost recovery terms for early retirement of Craig 2 and Hayden 1 and 2 at this time in this rate Proceeding.

67. CEC recommends that the Commission reject the accelerated depreciation approach advocated by Staff because it violates intergenerational equity and the matching principle and further increases rates, which are already proposed to increase significantly

¹⁷ Staff's SOP at 7-8. (Footnote 15 omitted)

following this case. CEC turns Staff's intergenerational equity argument on its head, contending instead that under Staff's approach, customers taking service after the early retirement gain all of the benefits of lower carbon emissions and, potentially, lower costs while bearing none of the additional costs that existing customers will carry. With respect to a regulatory asset approach, CEC concedes that it would be appropriate for the Commission to establish a regulatory asset in this rate case. But CEC argues that the Commission should withhold judgment on the appropriate amortization period until economic conditions closer in time to cost recovery and information regarding securitization are known. CEC states that the Commission can consider the rate impacts based on the rates and economic conditions affecting ratepayers at the time they are asked to pay those costs, rather than today when those considerations are unknown. CEC adds that if the Commission defers a decision on a specific amortization period and simply authorizes the creation of a regulatory account at this time, Public Service and the Commission would have ample time to consider securitization and, possibly, save customers money as a result.

68. Climax argues that securitization options for Craig 2 and Hayden 1 and 2 have not been fully vetted in the record of this rate case. For example, Climax points out that Public Service did not analyze either combining Craig 2 and Hayden 1 and 2 to reduce issuance and administration costs by a factor of three, or partial securitization, with or without the coal assets of Pawnee that will be retired when it is to convert it to gas in 2026. But unlike CEC, Climax argues that the evidence in the record of this rate case is too imprecise to provide substantial support for the appropriate retirement cost recovery approach. Climax states that the estimated net book values at the retirement dates and the decommissioning costs are rough estimates of six to seven years in advance of the actual retirement dates, and notes that such costs have already

changed from the ERP Proceeding to this rate case and that the Company has admitted that the costs will change more before the retirement dates. Climax also argues that ongoing changes in statutory and regulatory policy affecting Public Service, its revenue requirements and rates, and its customers' payment obligations will likely impact on cost recovery and thus should be addressed closer to the actual retirement dates for the Craig and Hayden units.

69. Sierra Club argues in its SOP that there is no compelling reason for the Commission to decide the cost recovery issue surrounding the early retirement of the Craig and Hayden units in this rate case, whereas there are compelling reasons to defer the decision until the Commission has an adequate record comparing securitization to other cost recovery methods. Sierra Club also argues that there is no evidence that delaying the cost recovery decision would cause any harm—so long as the Commission acts before 2027. Regarding intergenerational impacts, Sierra Club warns that the issue is highly subjective and argues, for instance, that Staff ignores the inequity from asking current ratepayers to shoulder the entire expense of coal unit retirements that will result in health and environmental benefits for future ratepayers.

70. In its SOP, FEA opposes accelerated depreciation for the Craig and Hayden units. FEA argues that the unrecovered costs of the coal units can be used for extraordinary rate treatment at the time they are retired, allowing for the spread of the costs over several generations of customers instead of one generation. FEA further contends that a regulatory asset treatment would allow for securitization to be examined as a potential financing option for the costs. FEA concludes that all methods of cost recovery should be considered, including the use of securitization, to ensure that the costs to customers are mitigated to the greatest extent possible.

B. Findings and Conclusions

71. We decline to address in this Decision how the costs associated with the planned early retirement of the Craig and Hayden units will be recovered from ratepayers. The record in this Proceeding fails to provide a comprehensive examination of all the potential options for cost recovery of the coal units at Craig 2 and Hayden 1 and 2, as noted by CEC, Climax, Sierra Club, and FEA. We further agree with Climax and Sierra Club that decisions regarding the recovery of the costs of retiring the coal units at Craig 2 and Hayden 1 and 2 are not required in this Proceeding and can instead be made later, closer to the planned early retirement dates. We therefore determine that decisions regarding cost recovery for the early retirement of the Craig and Hayden units will be rendered in separate, future proceedings.

72. As to securitization as raised by certain parties in this Proceeding, it would be helpful to have outside expertise to provide guidance as to how and if securitization is appropriate for plants the size of Craig 1 and Hayden 1 and 2, particularly given the decisions to be rendered in the Company's ongoing ERP Proceeding, and whether and how securitization would have an effect on Public Service's capital structure within that larger context of coal plant retirements. We may pursue such expertise in the ERP Proceeding or a subsequent proceeding.

V. ADDITIONAL ISSUES**A. Capital Structure**

73. We recognize that base rates include the large majority of capital expenditures which are financed through a combination of equity and debt investment. The cost of debt is directly quantifiable and readily incorporated into the calculation of base rates.¹⁸ The "cost" of equity investment (*i.e.*, the required return of the market) and the equity-to-debt ratio (*i.e.*, the

¹⁸ See Hrg. Exh. 125 (Johnson Rebuttal), Att. PAJ-10.

capital structure) are far less direct for the Commission to ascertain. For example, in this Proceeding, Public Service supported its requested cost of equity by using four methodologies to arrive at the requested ROE, three of which included wide ranges of outputs.¹⁹ In fact, the Company presented model results that indicate an ROE value between 9.03 percent²⁰ and 12.86 percent,²¹ a spread of 383 basis points.

74. Intervenors introduced several additional ROE calculation methodologies and still wider ranges of potential ROE values for Commission consideration.²² Several intervenors also introduced alternative capital structure values, some with dramatically different results from the Company's calculations.²³ The Commission also notes that the Company and intervenors recognize the significant interplay between ROE and capital structure, as these key components to a utility's WACC (*i.e.*, the ultimate return allowed by a regulatory body) are, in fact, highly correlated and potential substitutes for one another.²⁴

75. The record reflects that the capital structure for Public Service has historically been developed independently of its parent, Xcel Energy, Inc. (Xcel Energy).²⁵ The record also establishes that equity is raised by Xcel Energy, and that Xcel Energy is the entity that interfaces with, and is disciplined by, equity markets. We note that the record in this Proceeding lacks a

¹⁹ See Hrg. Exh. 104 (Bulkley Direct), Figure AEB-D-1.

²⁰ *Id.*, Figure AEB-D-6.

²¹ *Id.*, Figure AEB-D-8.

²² See, *e.g.*, Hrg. Exh. 401 (Sigalla Answer), Att. FDS 11 which indicates a new methodology not applied by the Company (the Multi-Stage Discounted Cash Flow approach) and a result (7.99 percent) well outside the Company's results. See also Hrg. Exh. 601 (Walters Answer), Table CCW-11, which indicated a range from 6.29 percent to 12.91 percent for the Capital Asset Pricing Method approach.

²³ See Hrg. Exh. 901 (Garrett Answer), at 81-82 and Hrg. Exh. 500 (Fernandez Answer) at 25.

²⁴ See Hrg. Exh. 103 (Johnson Direct) at 14-15, Hrg. Exh. 901 (Garrett Answer) at 74-76.

²⁵ See Hrg. Exh. 125 (Johnson Rebuttal) at 14 – 17.

robust examination of the potential use of the capital structure of Xcel Energy, as the appropriate capital structure for establishing WACC in Colorado.

76. In approving the Settlement, we will not disturb the capital structure agreed to by the Settling Parties in this Proceeding. In future rate cases however, the Commission may decide to move away from such practice. Any shift would be gradual and responsible, made in the context of the overall establishment of just and reasonable rates in future proceedings.

B. Establishment of Rates and the Calculation of Revenue Requirements

77. Although we authorize Public Service to modify its rate schedules in accordance with the Settlement, this Decision provides us with an opportunity to address recent trends in Public Service's responses to final rate orders through judicial review with respect to the Commission's establishment of rates and various cost inputs, calculations, and findings made to determine revenue requirements in the rate setting process.²⁶

78. An electric utility's base rates are the most significant rates and charges billed to its retail customers. Base rates for electric service fund the bulk of the utility's investments in generation, transmission, and distribution infrastructure as well as its investments in meters, services, computer systems, and other equipment and facilities needed to provide electricity to consumers. Base rates thus provide utilities a substantial source of revenue to cover the costs of providing service. Base rates are also the mechanism by which utilities collect sufficient revenues to ensure financial soundness of the utility, provide a reasonable return to their shareholders, and to cover the costs of debt payments that finance the investments necessary to fulfill the utility's obligation to serve and meet regulatory standards of service consistency. The

²⁶ *Pub. Serv. Co. of Colo. v. Colo. Pub. Utils. Comm'n*, Case No. 2020CV32793 (Denver Dist. Ct., Jan. 6 2022); *Pub. Serv. Co. of Colo. v. Colo. Pub. Utils. Comm'n*, Case No. 19CV31427 (Denver Dist. Ct., Mar. 12, 2020).

capital, operating, and financing costs to achieve these objectives are interrelated and themselves represent a balance of interrelated inputs to the determination of just and reasonable rates. As explained below, the combination of costs intended to be recovered through base rates form the basis for a calculated revenue requirement and represent an expected level of cash flow determined to be within a range necessary to meet these larger objectives.

79. Base rates work in conjunction with other types of rates, including rate adjustment mechanisms, such as Public Service's ECA and its PCCA, and surcharges, such as the Company's Renewable Energy Standard Adjustment. Rate adjustment mechanisms and surcharges are designed to recover revenue requirements not included in the utility's base rate revenue requirements. Rate adjustment mechanisms tend to change annually, quarterly, or even more frequently depending on the volatility of the costs included in the revenue requirements addressed by the rate adjustment mechanisms. In contrast and by design, base rate revenue requirements are not volatile and are instead presumed to be long-lasting.

80. Base rates are also distinguishable from rate adjustment mechanisms in that base rates are generally not reconciled to revenue collections from retail customers or to deviations from costs included in the underlying base rate revenue requirement, thereby balancing various risks and rewards between ratepayers and shareholders. This feature of base rates embodies important regulatory principles, particularly with respect to incentives for the utility to control its costs between base rate proceedings in the mutual interest of customers and investors.

81. The Commission establishes base rates by examining changes in the utility's underlying revenue requirements. The revenue requirement is determined by examining the utility's costs of providing service. In support of an increase in rates, the electric utility files a cost-of-service study (COSS). The costs typically assessed by a COSS are those the utility

incurs over a one-year period called a test year. The Commission explained that it uses the test year:

to evaluate and to adjust (as necessary) the interrelationships of a utility's revenue, expense, and capital investment to determine whether the utility has a revenue excess or deficiency. These components should correspond to each other over the same time period or according to the same operating conditions. This is known as the 'matching principle' and it is designed to ensure 'that the cost of service reflects the operational relationships and interplay between rate base, expenses, and revenues in a manner that is representative of the period when the resulting rates will be in effect.'²⁷

Cost-based base rates derive from the calculated annual base rate revenue requirements, such that under normal expected circumstances, the utility collects the costs underlying the COSS for the test year, as adjusted.

82. As explained above, each Commission order adopting base rates is made pursuant to § 40-3-101(1), C.R.S., based on findings that the rates are just and reasonable. An electric utility's base rates thus evolve through a sequence of advice letter filings and, when necessary, Commission orders with related findings to the justness and reasonableness of the Company's rates and charges. Due to the numerous and variable inputs and assumptions required to complete a COSS, to calculate billing determinants, and to establish base rates, the evidentiary record in a base rate proceeding can support a continuum of just and reasonable rates as final outcomes from the rate case. Such a range is recognized by the foundational selection of the test year²⁸ as well as the "matching principle." However, for practical purposes—such as for customer billing—specific values for rates and charges must be set forth on the utility's tariff schedules. The necessary precision required to establish the specific rates set forth on a utility's

²⁷ Decision No. R19-1033, issued December 27, 2019, Proceeding No. 19AL-0075G at 32 (¶ 70) (citing Decision No. C11-1373 issued in Proceeding No. 11AL-382E on December 22, 2011 at 20 (¶ 51)).

²⁸ "Ultimately, the choice of test year is a matter of choosing regulatory policy; this choice is not fact-dependent." Decision No. R13-1307, issued October 22, 2013, Proceeding No. 12AL-1268G at 49 (¶ 134).

base rate tariff sheets conceal the spread of alternative revenue outcomes that the Commission can support as just and reasonable with respect to the COSS inputs and assumptions as well as billing determinants within a given rate case evidentiary record.

83. Notably, such rate case decisions do not establish a level of base rate revenues that the utility is entitled to recover, dollar-for-dollar, on an annual basis from retail customers. The relief granted to an electric utility in a base rate proceeding is limited to allowing for the changed base rate levels for application on customer bills prospectively. Commission decisions establishing modified rates at the end of a base rate proceeding do not entitle the utility to a specific level of base rate revenue collections. Rather, the decisions authorize the utility to charge those rates approved in the base rate proceeding.

84. With this in mind, we note that the COSS used to establish the GRSA and GRSA-E pursuant to the Settlement, which set forecasted numbers down to the last dollar and capital structure percentages out to the hundredth of a decimal, uses a high level of precision to arrive at rates to be included on the Company's tariff sheets. We emphasize that the findings, conclusions, and directives that address components of the underlying COSS only provide general guidance so that the Company may implement the rates we have deemed just and reasonable. Consistent with the discussion above, in this Proceeding we are establishing just and reasonable rates, not adopting the components of the COSS. In future proceedings, the Commission may address the indeterminacy of various COSS components by identifying ranges of costs or cost drivers, such as the percentage of equity.

C. Phase II Rate Case

85. Public Service filed Advice Letter No. 1857-Electric prior to the issuance of a final decision in its most recent Phase II rate case, Proceeding No. 20AL-0432E. This Phase I

case was initiated ten days prior to the issuance of Decision No. R21-0400 (Recommended Decision) issued on July 12, 2021, a decision that was substantially modified by the Commission's decision on exceptions, Decision No. C21-0536, issued on September 2, 2021.

86. Notably, the Commission set aside the requirement in the Recommended Decision that Public Service must file a Phase II rate case within 180 days of the effective date of a final decision in a future Phase I rate case.²⁹ However, the Commission did not take issue with the Administrative Law Judge's (ALJ) findings and conclusions supporting the directive to require the filing of a follow-on Phase II rate case. For example, the Commission left undisturbed the finding that the Company's proposed \$6 per month Services and Facilities (S&F) charge was not cost-based and that any appropriate increased customer-related costs could be recovered through an increase in the S&F charge reflected in a class cost of service study (CCOSS) in a future Phase II rate case.³⁰ The ALJ further directed Public Service to provide in its next Phase II rate case, "a thorough analysis in its CCOSS of the impact of increasing the monthly demand threshold in Schedule C and Schedule C-TOU to 50 kW, as well as whether the monthly demand threshold in Schedule C-TOU should be increased to 75 or 100 kW in the future."³¹ The Commission instead stated that it may determine whether a follow-on Phase II rate case is necessary and when it should commence based on the record of the anticipated Phase I rate case and the Commission's findings and conclusions rendered in the future proceeding.³² The Commission further warned Public Service of the risks of filing a standalone Phase I rate case, stating that: "the filing of a Phase I rate case with a proposed uniform percentage rider based

²⁹ Decision No. C21-0536, issued on September 2, 2021, Proceeding No. 20AL-0432E, at 37, (¶ 100).

³⁰ Decision No. R21-0400, issued July 12, 2021, Proceeding No. 20AL-0432E, at 40, (¶ 92.).

³¹ Decision No. R21-0400, issued July 12, 2021, Proceeding No. 20AL-0432E, at 44, (¶ 103).

³² Decision No. C21-0536, issued on September 2, 2021, Proceeding No. 20AL-0432E, at 37, (¶ 100).

upon existing rate structures (*i.e.*, a GRSA), to be in effect pending the decision in Phase II, does not eliminate the burden on Public Service to show that the proposed GRSA results in just and reasonable rates.”³³ The Commission further clarified that Public Service is not precluded from filing a combined Phase I and II rate case “if that is the type of case it wants to file.”³⁴

87. In approving the Settlement, we will allow Public Service to put into place the GRSA and the GRSA-Energy for effect on April 1, 2022, calculated in the manner set forth in Public Service’s Direct Testimony. We further direct Public Service to file a Phase II rate case to modify its base rate schedules to eliminate these rate adjustments no later than six months following the effective date of this Decision. This directive comports with the conclusion of the Company’s previous Phase II rate in Proceeding No. 20AL-0432E and is necessary given the Company’s decision to file a standalone Phase I rate case in this Proceeding.

VI. ORDER

A. The Commission Orders That:

1. The effective date of the tariff sheets filed by Public Service Company of Colorado (Public Service) on July 2, 2021 with Advice Letter No. 1857-Electric is permanently suspended and shall not be further amended.

2. The tariff sheets filed with Advice Letter No. 1857-Electric are permanently suspended and shall not be further amended.

3. The Unopposed Motion to Approve Unopposed and Comprehensive Settlement Agreement (Except as to One Issue) and Request for Waiver of Response Time (Settlement) filed on January 5, 2022, by Public Service; Staff of the Commission; the Office of Utility Consumer

³³ *Id.* at 38 (¶ 100).

³⁴ *Id.*

Advocate; Colorado Energy Consumers; Climax Molybdenum Company; Molson Coors USA LLC; Energy Outreach Colorado; Federal Executive Agencies; the Kroger Co.; Sierra Club; Wal-Mart Stores, Inc.; and Western Resource Advocates is granted, consistent with the discussion above. A copy of the Settlement Agreement is attached to this Decision as Appendix A.

4. Public Service shall file an advice letter compliance filing to modify the tariff sheets in Colorado PUC No. 8 consistent with the findings, conclusions, and directives in this Decision. Public Service shall file the compliance tariff sheets in a separate proceeding and on not less than two business days' notice, for effect on April 1, 2022. The advice letter and tariff sheets shall be filed as a new advice letter proceeding and shall comply with all applicable rules. In calculating the proposed effective date, the date the filing is received at the Commission is not included in the notice period and the entire notice period must expire prior to the effective date. The advice letter and tariff must comply in all substantive respects to this Decision in order to be filed as a compliance filing on shortened notice.

5. The compliance filing advice letter establishing rates effective April 1, 2022 shall reset the residential Revenue Decoupling Adjustment (RDA) baseline and will implement the other revisions to Public Service's Electric Tariff necessary to reflect the terms of the Settlement, consistent with the discussion above.

6. Public Service is authorized to file a compliance advice letter, effective July 1, 2022, in the event that the total actual capital-related revenue requirement through December 31, 2021, is less than projected in the Settlement Test Year for the purpose of reducing the General Rate Schedule Adjustment (GRSA) prospectively to reflect the actual total capital-related revenue requirements, consistent with the terms of the Settlement. If necessary, Public Service

shall file the compliance tariff sheets establishing the modified GRSA in a separate proceeding and on not less than two business days' notice, and such filing will also reset the RDA baseline, in accordance with the Settlement.

7. Public Service shall file a Phase II rate case no later than six months following the effective date of this Decision, consistent with the discussion above.

8. The 20-day period provided for in § 40-6-114, C.R.S., within which to file applications for rehearing, reargument, or reconsideration, begins on the first day following the effective date of this Decision.

9. This Decision is effective upon its Mailed Date.

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING
March 16, 2022.**

W

(S E A L)



ATTEST: A TRUE COPY

Doug Dean,
Director

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

ERIC BLANK

JOHN GAVAN

MEGAN M. GILMAN

Commissioners

Exhibit No. XES - 300

Direct Testimony of Mr. Arthur P. Freitas of XES

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Public Service Company of Colorado

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)

Docket No. ER22-____-000

**DIRECT TESTIMONY
OF
ARTHUR P FREITAS**

**ON BEHALF OF
PUBLIC SERVICE COMPANY OF COLORADO**

MARCH 31, 2022

DIRECT TESTIMONY OF ARTHUR P FREITAS

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**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

SUMMARY OF THE DIRECT TESTMONY OF ARTHUR P. FREITAS

Mr. Freitas provides testimony in support of the filing by Public Service Company of Colorado (“PSCo” or “Company”) to revise the transmission formula rate template (“Template”) set forth in the Attachment O-PSCo to the Xcel Energy Operating Companies Joint Open Access Transmission Tariff (“Xcel Energy Tariff”). Mr. Freitas provides an overview of PSCo; introduces PSCo’s other witness in this proceeding (Ms. Laurie J. Wold); and explains the changes to the Template that PSCo proposes to become effective April 1, 2022 (the “Revised Template”). Mr. Freitas’ testimony states that the Revised Template reflects revised Utility Plant depreciation rates. Mr. Freitas also calculates the estimated cost impact of the Revised Template on the PSCo Annual Transmission Revenue Requirement (“ATRR”) and PSCo’s wholesale transmission and ancillary services customers.

DIRECT TESTIMONY OF

ARTHUR P. FREITAS

I. INTRODUCTION AND EXPERIENCE

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Arthur P. Freitas. My business address is 1800 Larimer Street, Denver, Colorado 80202

Q. BY WHOM ARE YOU EMPLOYED AND WHAT IS YOUR POSITION?

A. I am employed by Xcel Energy Services Inc. (“XES”), the centralized service company subsidiary of Xcel Energy Inc. (“Xcel Energy”), as Manager of Revenue Analysis.

Q. PLEASE DESCRIBE XCEL ENERGY.

A. Xcel Energy is a public utility holding company with, among other subsidiaries, four wholly owned, vertically integrated public utility operating company subsidiaries: Public Service Company of Colorado (“PSCo” or the “Company”), Northern States Power Company, a Minnesota corporation (“NSPM”), Northern States Power Company, a Wisconsin corporation (“NSPW”), and Southwestern Public Service Company (“SPS”) (together, the “Xcel Energy Operating Companies”).

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of PSCo.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.

A. I graduated from Marquette University with a Bachelor’s degree in Business Administration in 1994. I worked for Boston Gas Company from 1998 through 2000 as a rate analyst. In 2000, I began working for a consulting group, La Capra Associates.

1 While at La Capra Associates, I gained a broad range of experience and expertise that
2 encompassed utility functions from system planning through retail ratemaking. I
3 performed analyses on a range of topics that included retail cost allocation and rate
4 design, electricity market design and analysis, power market forecasting, and integrated
5 resource planning. I have significant experience involving the regulatory process. I have
6 participated in the regulatory process on behalf of both regulated utilities and other
7 interested stakeholders in multiple states. The issues explored include cost allocation and
8 retail rate design, integrated resource planning, resource acquisition, transmission system
9 expansion, and renewable energy policy. During the course of my involvement in
10 numerous regulatory proceedings, I have drafted and reviewed pre-filed testimony,
11 developed and responded to discovery, and conducted analyses on issues relevant to the
12 proceeding to support the testimony of expert witnesses. In 2011, I joined XES as
13 Principal Rate Analyst and was promoted to Manager of Revenue Analysis for PSCo's
14 affiliate, SPS. I assumed my current role as Manager of Revenue Analysis for PSCo in
15 April 2020.

16 I submitted pre-filed testimony before the Colorado Public Utilities Commission
17 ("CoPUC") on the revenue requirement calculation in Proceeding Nos. 20A-0204E and
18 20A-0300E. I have also testified before the New Mexico Public Regulation Commission
19 in Case No. 17-00255-UT on SPS's cost of service and on transmission costs. I also
20 submitted pre-filed testimony on those same issues in Case Nos. 19-00170-UT, 15-
21 00139-UT, and 15-00296-UT. In Case No. 17-00044-UT I submitted testimony on the
22 revenue requirement calculations in an application for a Certificate of Convenience and
23 Necessity to construct two wind projects. I testified before the Public Utility

1 Commission of Texas (“PUCT”) in Docket No. 43695, a rate case filed in 2014,
2 regarding expenses incurred and revenues received from the Southwest Power Pool and
3 other utilities under the applicable Open Access Transmission Tariff. In addition, I
4 submitted pre-filed testimony in PUCT Docket Nos. 49831, 47527 and 45524, both of
5 which were base rate cases. I also submitted pre-filed testimony to the PUCT in Docket
6 Nos. 42042 and 42004 regarding transmission-related costs incurred under tariffs
7 approved by the Federal Energy Regulatory Commission (“FERC”). In Docket No.
8 46936, I submitted testimony on the revenue requirement calculations in the companion
9 application in Texas for a Certificate of Convenience and Necessity to construct two
10 wind projects. I have also submitted pre-filed testimony on cost of service and formula
11 rate mechanisms before the FERC in Docket Nos. ER19-404, ER19-675, and ER20-277.
12 Finally, I have testified before the Massachusetts Department of Public Utilities on behalf
13 of Blackstone Gas Company, and I have submitted pre-filed testimony to the New
14 Hampshire Public Utilities Commission on behalf of the Office of Consumer Advocate.

15 **Q. WHAT ARE YOUR DUTIES IN YOUR CURRENT POSITION?**

16 A. As Manager, Revenue Analysis, I provide project supervision and technical expertise for
17 jurisdictional cost of service studies, revenue requirement determinations, and related
18 projects for PSCo. I lead a team of analysts who develop revenue requirement models to
19 support the rates charged by PSCo. I direct, review, and analyze the revenue
20 requirements that support the base rates, rate riders, and FERC formula rates used by
21 PSCo.

4 A. Yes, I have submitted testimony before the Commission as well as a number of state
5 commission as outlined in my professional experience cited above.

8 A. Yes.

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

11 A. The purpose of my testimony is to support PSCo's revisions to Attachment O-PSCo to
12 the Xcel Energy Operating Companies Joint Open Access Transmission Tariff ("Xcel
13 Energy Tariff" or "Tariff"). Attachment O-PSCo is a transmission formula rate template
14 (the "Template" or "Formula Rate Template") used to calculate the rates applicable to
15 PSCo's wholesale transmission service and ancillary services customers. As part of this
16 filing, PSCo is submitting revisions to Table 25 of the Template. I refer to these
17 revisions as the "Revised Template." In my testimony:

- I provide an overview of PSCo;
- I provide an overview of the filing and introduce PSCo’s other witness, Ms. Laurie J. Wold;
- I explain PSCo’s changes to the Formula Rate Template. The Revised Template reflects revised Utility Plant depreciation Rates in Table 25 supported by Ms. Wold; and
- I discuss the estimated cost impact of the Revised Template on PSCo’s annual transmission revenue requirement (“ATRR”) and PSCo’s Wholesale Transmission Service Customer class.

Q. ARE YOU SPONSORING ANY EXHIBITS?

A. Yes. I am sponsoring the following exhibits which are attached to my testimony:

<u>Exhibit No.</u>	<u>Description</u>

XES – 301	Transmission Customer Annual Revenue Impacts

I am also sponsoring Exhibits No. XES – 100 and XES – 101, which are the clean and marked tariff pages to the Revised Template.

III. OVERVIEW OF PSCO’S FILING

A. OVERVIEW OF PSCo

Q. PLEASE DESCRIBE PSCo.

A. PSCo is a wholly-owned utility operating company subsidiary of Xcel Energy Inc. (“Xcel Energy”), a public utility holding company. PSCo is an integrated electric utility that, *inter alia*, generates, transmits, distributes, and sells electric energy at cost-based regulated rates to approximately 1.5 million retail customers in the State of Colorado subject to the regulatory authority of the CoPUC, and cost-based wholesale production services to five customers. PSCo also provides cost-based retail natural gas service to

1 approximately 1.4 million customers in Colorado, and steam service to approximately
2 120 customers in Denver, Colorado, also subject to the jurisdiction of the CoPUC.

3 PSCo provides wholesale transmission service at cost-based rates to customers
4 under the Xcel Energy Tariff. Wholesale customers comprise approximately fifteen (15)
5 percent of the transmission loads on the PSCo system.

6 **B. PSCo’s FILING AND OTHER WITNESS’S TESTIMONY**

7 **Q. PLEASE DESCRIBE THE CURRENTLY EFFECTIVE PSCo FORMULA RATE**
8 **TEMPLATE.**

9 A. The PSCo Formula Rate Template is a transmission formula rate. The Formula Rate
10 Template is on file with the Commission as Attachment O-PSCo to the Xcel Energy
11 Tariff. The Attachment O-PSCo Formula Rate Template was added to the Xcel Energy
12 Tariff in Docket No. ER12-1589-000 *et al.* In addition to the formula calculations
13 themselves, Appendix 1 to Attachment O-PSCo is a set of Annual Formula Rate
14 Implementation Procedures (the “Protocols”).

15 PSCo calculates its ATRR pursuant to the formulae set forth in the Template.
16 These annual transmission revenue requirements are then used to calculate rates for Firm
17 and Non-Firm Point-to-Point Transmission Service provided under Schedules 7 and 8
18 and Network Integration Transmission Service (“NITS”) provided under Schedule 13 of
19 the Tariff. PSCo employs a forward-looking Template, whereby the ATRR is projected
20 under the Template each year using estimated costs and loads. The ATRR projections
21 are then subject to an annual true-up (“Annual True-up”) based on actual costs and loads
22 (as reported in PSCo’s FERC Form No. 1 report) when actual data becomes available.
23 PSCo calculates the Annual True-up by June of the year following the estimated Rate

1 Year, and the true-up is applied to customer bills by the end of the year following the
2 estimated Rate Year through a one-time adjustment. For example, the Estimated Rates
3 for 2022 will be subject to true-up in June 2023, with the true-up applied to bills by the
4 end of 2023. In addition to postings on OASIS, customer meetings, discovery and
5 potential informal and formal challenge processes under the Protocols, PSCo submits an
6 annual informational filing with the Commission with the Estimated Rates for the
7 upcoming Rate Year and the Actual rates for the prior Rate Year. The 2022 annual
8 informational filing was submitted in Docket No. ER12-1589-000 on January 18, 2022.

9 **Q. PLEASE SUMMARIZE THE CHANGES TO THE FORMULA RATE**
10 **TEMPLATE PSCO IS SUBMITTING IN THIS FILING.**

11 A. As supported in the Direct Testimony of Ms. Wold, PSCo is proposing to update its
12 authorized Utility Plant depreciation rates to reflect changes to those depreciation rates
13 approved by the CoPUC, also effective April 1, 2022.

14 **Q. WHAT IS THE PROPOSED EFFECTIVE DATE FOR THE REVISED**
15 **TEMPLATE?**

16 A. PSCo is requesting an effective date of April 1, 2022 for the Revised Template, so the
17 depreciation rates will continue to be consistent with depreciation rates approved by the
18 CoPUC and can be reflected in the 2022 True-up, to be calculated later in 2023 and
19 reflected in invoices to customers before year-end 2023.

20 **Q. PLEASE INTRODUCE THE OTHER WITNESS PROVIDING TESTIMONY IN**
21 **SUPPORT OF PSCO'S PROPOSED TARIFF CHANGES.**

1 A. PSCo's filing is also supported by the Direct Testimony and Exhibits of Ms. Laurie J.
2 Wold, Manager of Capital Asset Accounting for XES, Exhibit Nos. XES - 200 to XES -
3 203 (the "Wold Direct Testimony").

4 **Q. WHAT DOES MS. WOLD ADDRESS IN HER TESTIMONY?**

5 A. Ms. Wold supports PSCo's updates to Table 25 of the Template to reflect revised
6 depreciation rates for Utility Plant. Ms. Wold describes the process PSCo used in
7 calculating the proposed depreciation rates pursuant to a Depreciation Rate Study
8 prepared by Alliance Consulting Group, sponsors the proposed Utility Plant depreciation
9 rates in Table 25, and calculates the resulting change in transmission depreciation
10 expense on a total Company basis.

11 **Q. HAVE YOU QUANTIFIED THE IMPACT OF THE REVISED TEMPLATE ON**
12 **PSCO'S WHOLESALE TRANSMISSION SERVICE CUSTOMERS?**

13 A. Yes. I present the annual customer impact in Exhibit No. XES - 301, which is attached to
14 my testimony. In Section VI of my testimony, I discuss my calculations of the annual
15 customer impact presented in Exhibit No. XES - 301.

16 **IV. UTILITY PLANT DEPRECIATION RATES**

17 **A. PSCO'S CHANGES TO ITS UTILITY PLANT DEPRECIATION**
18 **RATES**

19 **Q. WHY IS PSCo UPDATING ITS DEPRECIATION RATES FOR UTILITY**
20 **PLANT?**

21 A. As discussed by Ms. Wold, PSCo is updating the Utility Plant depreciation rates in Table
22 25 to reflect the revised depreciation rates approved by the CoPUC in Case No. 21A-
23 0317E. PSCo's updated Utility Plant depreciation rates impact the calculation of

1 depreciation expense in the PSCo ATRR and result in a higher ATRR and thus higher
2 transmission rates than if Table 25 were not revised.

3 **V. IMPACT OF TEMPLATE CHANGES ON PSCO'S WHOLESALE**
4 **TRANSMISSION SERVICE CUSTOMERS**

5 **Q. HAVE YOU CALCULATED THE IMPACT OF THE TEMPLATE CHANGES**
6 **ON WHOLESALE TRANSMISSION CUSTOMERS?**

7 A. Yes. Using the 2022 Estimated Rates, I quantified the impact of PSCo's Revised
8 Template changes on PSCo's wholesale transmission ATRR. I also estimated the annual
9 impact of the updated depreciation rates on the Ancillary Service Rates.

10 **Q. WHAT IS THE DOLLAR IMPACT ON PSCO'S ATRR AND WHOLESALE**
11 **TRANSMISSION AND ANCILLARY SERVICES CUSTOMERS?**

12 A. Wholesale transmission customers taking service under the Tariff comprise
13 approximately 15 percent of the transmission loads on the PSCo system. The remaining
14 loads are PSCo retail native loads. The changes to the Utility Plant depreciation rates
15 result in an increase to the PSCo ATRR of \$6.1 million, and an estimated increase in
16 transmission charges to PSCo's wholesale transmission NITS customers of \$906,740.
17 The impact to wholesale Ancillary Services transmission customers that are not also
18 Production customers is an increase of \$234,718.

19 The ATRR and customer impact is presented in more detail in Exhibit No. XES -
20 301 to my testimony.

21 **Q. PLEASE DESCRIBE HOW YOU CALCULATED THE ANNUAL CUSTOMER**
22 **IMPACTS.**

23 A. To quantify the impact of the revisions related to Utility Plant depreciation rates, I
24 included the total Company impact by function, as presented on Page 37 of Exhibit XES-

200 (Ms. Wold's Testimony), by adding the incremental depreciation expense to the estimated depreciation expense at authorized rates in the 2022 Estimated Transmission Formula. This produced revised 2022 Estimated Rates which I then applied to 2021 actual billing determinants to calculate the impact to each wholesale network and ancillary service customer. This methodology essentially recreates the process by which wholesale transmission customers are currently billed by using the approved Formula Rate Template to perform the necessary allocations and rate calculations. The overall change in Utility Plant annual transmission-related depreciation and amortization expense is an increase of \$14.5 million for the PSCo system, calculated on an annualized basis using the estimated plant balances for calendar year 2022. Of the \$14.5 million total depreciation expense change, \$5.6 million is for transmission assets which is direct assigned to the transmission function, \$7 million is related to general plant and \$2 million is related to common plant. General and common plant is allocated to the transmission function, 10.6 percent for general and 7.5 percent for common. The wholesale transmission customers taking service under the Tariff are approximately 15 percent of the total transmission loads on the PSCo system. As such, the impact of the revising the Utility Plant depreciation rates in Table 25 is expected to be an annual rate increase to wholesale transmission service customers of about \$0.9 million on an annualized basis. The \$0.9 million compares to total 2022 estimated PSCo ATRR of approximately \$299.9 million, of which approximately \$44.4 million is recovered from wholesale transmission service customers. Thus, the annual rate impact to PSCo transmission customers is an ATRR increase of 2.04 percent compared to the ATRR calculated using the currently effective Utility Plant depreciation rates.

1 The impact to the Ancillary Service rates used a similar calculation. The only
2 difference is that I added the incremental depreciation expense to the actual 2020
3 depreciation expense, rather than the estimated 2022 depreciation expense as the
4 Ancillary Services rates are calculated using actual FERC Form 1 data, rather than
5 estimated data which is later trued up to actual. The total impact to Ancillary Services
6 charges is an increase of approximately \$329,000 out of total ancillary service charges of
7 \$23.2 million, or 1.4 percent. However, four of PSCo's wholesale transmission customers
8 also take service under PSCo's production formula tariff and, as a result, receive a
9 revenue credit for all generation based ancillary services charged under the transmission
10 formula. The net impact of increased ancillary service charges to the remaining
11 transmission customers is an annual increase of \$234,000 out of \$17.5 million in total
12 charges, or an increase of 1.3 percent.¹

13 These calculations are presented in Exhibit No. XES – 301 to my testimony.

14 **Q. HOW DOES PSCO PROPOSE TO IMPLEMENT THE TEMPLATE CHANGES**
15 **DESCRIBED HEREIN?**

16 A. PSCo proposes to implement all Revised Template changes described herein in effective
17 April 1, 2022. As described by Ms. Wold, depreciation expense will be calculated using
18 the depreciation rates proposed in her testimony starting April 1, 2022. The resulting
19 depreciation expense will then be included in the 2022 Transmission Formula True-Up
20 calculated in 2023.

¹ This calculation includes the impact to customers taking service under both Part III and Part IV of the Tariff.

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1 Commission accepts the changes, PSCo will calculate the 2022 Annual True-up to reflect
2 the impact of the Revised Template on the 2022 actual ATRR, and reflect the higher
3 ATRR in the true-up invoice adjustments issued in 2023.

4 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

5 A. Yes.

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Public Service Company of Colorado

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)
)

Docket No. ER22-_____

AFFIDAVIT OF ARTHUR P FREITAS

State of Colorado)
) ss:
County of Denver)

Arthur P. Freitas, being duly sworn, hereby certify that the foregoing affidavit and exhibits have been prepared under his direct supervision and that the facts, representations, and statements set forth therein are true and accurate to the best of his knowledge, information, and belief.



Arthur P. Freitas

Dated: March 30, 2022

Public Service Company of Colorado submits this verification without a notary's attestation. The notarization requirement has been waived pursuant to Extension of Non-Statutory Deadlines, Supplemental Notice Waving Regulations in Docket No. AD20-11-000 (Dec. 8, 2021).

Exhibit No. XES - 301

Transmission Customer Annual Revenue Impacts

Exhibit XES - 301

	Annual Charge (proposed depreciation rates, \$)	Annual Charge (current depreciation rates, \$)	Impact (\$)	% Impact
Network Charges	45,347,817	44,441,076	906,740	2.04%
Ancillary Services Charges (total)	23,530,921	23,201,907	329,014	1.42%
Ancillary Services Charges (Production Customers, credited back)	5,806,296	5,712,000	94,295	1.65%
Ancillary Services Charges (Non-Production Customers)	17,724,625	17,489,907	234,718	1.34%