

January 8, 2018

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 Open Access Transmission Tariff
Tariff ID 2001
Docket No. ER18-____-000
Notice of Cancellation of Expired Attachment O-PSCo eTariff Records**

Dear Secretary Bose:

Pursuant to Section 35.15 of the Rules and Regulations of the Federal Energy Regulatory Commission's ("Commission"), Rules and Regulations, 18 C.F.R. § 35.15 (2017), and Order No. 714,¹ Xcel Energy Services Inc., on behalf of Public Service Company of Colorado ("PSCo"),² submits this Notice of Cancellation to remove certain long-expired provisions to the Xcel Energy Operating Companies Open Access Transmission Tariff ("Xcel Energy OATT") from the Commission's eTariff system.³ The revisions remove from the eTariff system certain historic provisions related to the Attachment O-PSCo transmission formula rate which were replaced by a tariff revisions agreed to in a partial settlement approved by the Commission in Docket No. ER12-1589-000 and effective in 2012, but apparently not omitted from the eTariff system.

Specifically, during the preparation of a recent revision to the currently effective Attachment O-PSCo forward looking transmission formula rate,⁴ XES personnel realized that the long replaced historic test year Attachment O-PSCo formula rate tariff records were still posted in the eTariff system. As such, the eTariff system includes two Attachment O-PSCo formula rates: both the currently effective forward looking formula placed into effect in Docket No. ER12-1589, and the historic test year Attachment O-PSCo formula rate placed into effect in Docket No. ER04-1174-000 *et al.* but superseded by the forward looking formula rate in Docket No. ER12-1589. This filing removes the outdated tariff records from the eTariff system.

¹ *Electronic Tariff Filings*, FERC Stats. & Regs. ¶ 31,276 (2008).

² PSCo is the designated e-Tariff filing entity for the Xcel Energy Tariff, consistent with the requirements of Order No. 714.

³ Xcel Energy Operating Companies, FERC Electric Tariff, Second Revised Volume No. 1.

⁴ See *Public Service Company of Colorado*, Docket No. ER18-483-000 (revisions to transmission-related depreciation rates set forth in Table 25 (WP_H-1) to the currently effective Attachment O-PSCo) (filed December 20, 2017).

PSCo respectfully requests an effective date for the cancellation of April 16, 2016, the date the current Xcel Energy OATT (Tariff ID 2001) became effective. The outdated eTariff records should have been identified and removed prior to the current Xcel Energy OATT (Tariff ID 2001) rebaseline filing in Docket No. ER16-1422-000. Alternatively, XES requests the outdated eTariff records be cancelled effective January 9, 2018, one (1) day after filing. As described herein, the expired Attachment O-PSCo eTariff records have not been effective since 2012, and should be removed from the Commission's eTariff system as soon as practicable.

I. BACKGROUND

PSCo is a wholly-owned 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. 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 Xcel Energy Tariff, respectively.

The Attachment O-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.⁵ Attachment O-PSCo was modified into a forward looking transmission formula rate template with a true-up in Docket No. ER12-1589, which was resolved by a partial settlement certified by the Presiding Administrative Law Judge and approved by the Commission.⁶ The partial settlement agreement reflected the intent of the parties for the forward-looking Attachment O-PSCo to replace the historic test year Attachment O-PSCo effective November 17, 2012. XES filed compliance filings to the Commission order approving the partial settlement, and those compliance filings were accepted by the Commission.⁷

Submission of the compliance filings apparently did not, however, result in the legacy historic test year Attachment O-PSCo tariff records being removed from the eTariff system when the new Attachment O-PSCo eTariff records were filed.⁸ Although the PSCo transmission

⁵ See *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).

⁶ See *Public Service Company of Colorado*, Delegated Letter Order, 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*, Delegated Letter Order (Aug. 16, 2016) (accepting tariff revisions to establish pro-ratio of accumulated deferred income taxes).

⁷ See *Public Service Company of Colorado*, Unpublished Letter Order (August 13, 2014) and *Public Service Company of Colorado*, 149 FERC ¶ 61,007 (2014)

⁸ At that time, the Commission's eTariff practices did not require Rule 602 settlements containing revised settlement tariff sheets to be filed in the eTariff system. The Commission issued a notice requiring that practice to be followed starting in 2016. See *Notice of Additional eTariff Type of Filing Codes* (December 1, 2016).

formula rate was subject to an audit by the Commission's Division of Audits starting in 2013, the duplicate Attachment O-PSCo eTariff records were apparently also not identified as part of the audit process.⁹

XES filed to restate the Xcel Energy OATT 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. That filing converted all Xcel Energy OATT eTariff records then on file in the eTariff system in PSCo Transmission Tariff ID 2000 to the new software system under Tariff ID 2001. XES personnel did not, apparently, identify that the long replaced Attachment O-PSCo tariff records were still in the eTariff system, so the expired Attachment O-PSCo eTariff records were not removed during the conversion process. The Commission accepted the successor PSCo Transmission Tariff ID 2001 effective April 16, 2016.¹⁰

II. NOTICE OF CANCELLATION OF TARIFF REVISIONS

A. Expired PSCo eTariff Records to be Cancelled

PSCo proposes to remove the following Xcel Energy OATT tariff records from the Commission's eTariff system. This eTariff Electronic Filing Package contains all required Tariff Record Content Data, metadata and a clean cancellation record in PDF for posting on eLibrary for the expired PSCo eTariff records identified below.

Description	Title/Agreement No.
Attachment O-PSCo	Public Service Company of Colorado Formulaic Rates, 0.1.0
Attachment O-PSCo	Rate Template, ATRR, Transmission Rates, Table 1, 0.1.0
Attachment O-PSCo	Rate Template, Rate Base, Table 2, 0.1.0
Attachment O-PSCo	Rate Template, Expenses, Table 3, 0.1.0
Attachment O-PSCo	Rate Template, Cap Struc, Allocations, Rev Credits, Table 4, 0.1.0
Attachment O-PSCo	Rate Template, Notes, Table 5, 0.1.0
Attachment O-PSCo	Rate Template, Appendix 1 - Attachment O Principles, 0.1.0
Attachment O-PSCo	Rate Template, Appendix 2 - Implementation Procedures, 0.1.0
Attachment O-PSCo	Rate Template, Appendix 3 - Depreciation Rates, 0.1.0

B. Proposed Effective Date and Requests for Waivers

To remove the expired Attachment O-PSCo tariff records from the eTariff system as promptly as practicable, PSCo respectfully requests an effective date for the cancellation of April 16, 2016, the date the current Xcel Energy OATT (Tariff ID 2001) became effective. The outdated eTariff records should have been identified during the eTariff software conversion process and never made part of the PSCo Transmission Tariff ID 2001. Alternatively, XES

⁹ See *Public Service Company of Colorado*, Docket No. PA13-14-000, Audit of Public Service Company of Colorado's Compliance with Xcel [Energy] Joint Open Access Transmission Tariff, Final Audit Report (July 21, 2015).

¹⁰ See *Public Service Company of Colorado*, Unpublished Letter Order (August 16, 2016).

requests the outdated eTariff records be cancelled effective January 9, 2018, one (1) day after filing. As described herein, the expired Attachment O-PSCo eTariff records have not been effective since 2012, and should be removed from the Commission's eTariff system as soon as practicable.

Because the sole purpose of this filing is to remove long expired tariff records from the eTariff system, XES respectfully requests that it be granted a waiver of the Commission's notice requirements for good cause shown. Specifically, pursuant to Section 35.15 of the Commission's rules and regulations, 18 C.F.R. § 35.15, PSCo requests that the Commission grant a waiver of the notice requirements to allow this cancellation to become effective on April 16, 2016. Waiver is appropriate so the expired eTariff records can be removed as if they were never made part of PSCo Transmission Tariff ID 2001. Further, this filing does not include any revisions to the language or legally effective provisions of the Xcel Energy OATT and thus does not disadvantage or harm any party.

C. Service and Posting

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 PSCo 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.

D. 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:¹¹

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¹¹ 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

January 8, 2018

Page 5

III. CONCLUSION

XES appreciates the Commission's prompt consideration of this matter. Please direct any questions regarding this filing to Ms. Tracee Holte (612-330-6206) or to the undersigned.

Respectfully submitted,

/s/ Liam D. Noailles

Liam D. Noailles

Manager, Federal Regulatory Affairs

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

CERTIFICATE OF SERVICE

I, Tracee J. Holte, hereby certify that I have this day served a notice of the enclosed document filing, electronically, on the Colorado Public Utilities Commission and each customer taking service from PSCo under the Xcel Energy OATT.

Dated at Minneapolis, Minnesota this 8th day of January 2018.

/s/ Tracee J. Holte

Tracee J. Holte

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