**BEFORE THE PUBLIC UTILITIES COMMISSION OF**

**THE STATE OF COLORADO**

DOCKET NO. 11A-1001E

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IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF

COLORADO FOR APPROVAL OF THE SMART GRID COST RECOVERY

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STATEMENT OF POSITION

OF

LESLIE GLUSTROM

AUGUST 31, 2012

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Leslie Glustrom,[[1]](#footnote-1) an Xcel rate payer, files this Statement of Position

in the above captioned docket related to the Application of the Public Service

Company of Colorado (“PSCo” or “Xcel”) for approval of the Smart Grid Cost Recovery.

The purpose of this docket is to determine whether Xcel should be granted an

additional $16 million in cost recovery for the Smart Grid City (“SGC”) project in Boulder, Colorado.

In Decision C11-0139 the Commission expressed concerns regarding the utility and completeness of the Smart Grid City saying:

19. We are also concerned with the relative lack of details regarding the planned use of the project going forward. We recognize the merits of both the value proposition analysis and the pricing pilot, but we believe additional information is necessary regarding the project. We believe it is important for the SGC project to achieve benefits in a cost-effective manner. In short, we want to see the Company articulate and defend a strategic plan for the use of SGC investment. We want to see the credible promise of consumer and utility benefits sufficient to

justify the cost overruns. We want to know more about the ability of customers to make practical use of SGC on their side of the meter through in-home devices, and we want to know more about the interconnect ability of SGC with those customer devices. (Decision C11-0139, ¶ 19)

In short the Commission stated in ¶ 19, Decision C11-0139 (reproduced above) that it wanted to see the following information:

* A strategic plan for the use of the SGC investment
* A credible promise of consumer and utility benefits sufficient to justify the cost overruns.
* The ability of customers to make practical use of SGC on their side of the meter through in-home devices;
* The interconnect ability of SGC with those customer devices.

While Xcel has once again provided voluminous testimony and exhibits in this docket, nothing in these hundreds of pages has met the requirements set out above by the Commission. As a result, there is no objective reason to take another $16 million from ratepayers to pay for the cost over runs in the Smart Grid City project.

For all the reasons that will be provided in the Statements of Position of other parties (e.g. Office of Consumer Counsel, City of Boulder, CF&I), Xcel’s request for an additional $16 million in cost recovery should be denied.

WHEREFORE, for all the reasons stated above, Ms. Glustrom respectfully requests that Xcel’s Request for $16 million in cost recovery for the Smart Grid City project be denied.

Respectfully submitted this 31st day of August 2012,

*\_\_/s/ Leslie Glustrom*\_\_\_\_\_\_\_\_\_\_

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1. Ms. Glustrom was a very active participant in the 08S-520E and 09AL-299E rate case and the 10A-124E Smart Grid CPCN dockets. She prepared extensive testimony and Statements of Position related to Xcel’s Smart Grid City project in those dockets. This information is available from the Colorado PUC website. Administrative notice has been given to documents from the 10A-124E as part of the record in this 11A-1001E docket in accordance with Decision C12-0379, ¶ 3 and Ms. Glustrom hereby incorporates the information from her 10A-124E filings in this Statement. [↑](#footnote-ref-1)