



October 11, 2017

Colorado Public Utilities Commission  
1560 Broadway, Suite 250  
Denver, CO 80202

Re: Xcel Energy's Colorado Energy Plan (proceeding 16A-0396E)

Dear Commissioners:

I am writing on behalf of Colorado Communities for Climate Action to provide comments on Xcel Energy's Colorado Energy Plan Portfolio as a new scenario to be evaluated in the upcoming second phase of Xcel's 2016 Electric Resource Plan proceeding. This would allow for the consideration of a new approach that provides for early retirement of two coal-fired generation units and their eventual replacement with other sources producing fewer heat-trapping emissions.

CC4CA is a coalition of 15 local governments advocating for state and federal actions to reduce climate-changing emissions, to protect the climate for current and future generations. Our members are Boulder County, the City of Fort Collins, the City of Westminster, the City of Boulder, Eagle County, Summit County, the City of Lafayette, the City of Golden, Pitkin County, San Miguel County, the City of Aspen, the Town of Vail, the Town of Basalt, the Town of Telluride, and the Town of Mountain Village. Our member governments include jurisdictions served by Xcel, and all of our members have interests at stake because of the impacts of this matter for Colorado's climate, economy, and quality of life.

Reducing emissions from electricity generation and consumption in Colorado is one of the most important steps that can be taken to protect our climate. CC4CA strongly supports actions by the Public Utilities Commission to reduce Colorado's contributions to climate change, including actions that would help meet the new climate goals established by Governor John Hickenlooper by his recent executive order, including:

- reducing statewide heat-trapping emissions by more than 26 percent by 2025, compared to 2005 levels—a first step toward the reductions that scientists tell us are necessary to avoid dangerous human interference with the climate; and
- reducing emissions from the electricity sector in Colorado by at least 25 percent by 2025 and at least 35 percent by 2030, compared to 2012 levels.

All across the nation, early retirements of coal-fired power plants are occurring, driven largely by changing market dynamics as cleaner sources become less expensive than coal-fired plants, but also by state policies to achieve needed emission reductions. Retiring two additional coal-fired generation units in Colorado would be consistent with these national trends.

Of course, the benefits of retiring the generation units will depend on the sources that come online to replace them. CC4CA strongly supports the use of clean, renewable sources that will meet our energy needs in ways that sharply reduce the extent to which humans continue

to change the climate. We are aware that Xcel's proposal has been described as potentially leading to no net increase in costs to ratepayers, which would be ideal. But it also remains essential that the PUC continue to consider how clean energy sources avoid the costs to Coloradans of climate change and its impacts, as reflected at least in part by the PUC's consideration of the so-called social costs of heat-trapping emissions. If chosen and properly implemented, the Colorado Energy Plan Portfolio has the potential to help accelerate the transition to a clean energy future and result in enormous benefits, both in terms of climate protection and to our state in many other ways.

CC4CA will continue to monitor the consideration of Xcel's Electric Resource Plan and may have additional comments as the proceedings continue.

Sincerely,

A handwritten signature in black ink, appearing to read "Anita Seitz". The signature is written in a cursive style with a large initial "A" and a long, sweeping tail on the "z".

Anita Seitz  
President