

# GRIDWARE

Recommendations for Xcel's Colorado  
2025-2027 Wildfire Mitigation Plan

# Challenges for Gridware's Portion of the WMP Filing with Rationale (1/2)

## High Costs & Consumer Sensitivity

- **Challenge:** The overarching \$1.9 billion total Wildfire Mitigation Plan (WMP) cost is 4X the 2020 WMP & the resulting bill increase of ~9.56% for residential customers presents major challenges. Consumer comments indicate frustration with cost increases, Public Safety Power Shutoff (PSPS) events, & perceptions of company profit motives.
- **Rationale:** Demonstrating that Non-Traditional Fault Detection Sensors (NTFDS) is a cost-effective technology relative to other mitigation measures is critical. Although NTFDS have grid benefits, its \$65MM cost for 29,000 devices may face scrutiny, especially since its direct protective capability is limited compared to other investments like targeted undergrounding.

## Learning Curve for the Public Utilities Commission (PUC)

- **Challenge:** This is only the second WMP for the PUC, & while Chair Blank's reelection is a stabilizing factor, the growing knowledge base may mean the PUC's attention is directed toward more immediate or controversial aspects of the plan.
- **Rationale:** NTFDS is buried in the application, not mentioned in the 2023 WMP Report, & uses complex technical language. The lack of clear framing for NTFDS may result in limited focus or understanding from the PUC, requiring greater education to demonstrate its value.

## Competition for Focus with PSPS Events & Consumer Impacts

- **Challenge:** PSPS events & their associated consumer frustration dominate public discourse & regulatory priorities. Communication gaps & business impacts caused by the first 2024 PSPS events in CO receive more public & regulatory focus than newer technologies like NTFDS.
- **Rationale:** Without a clear narrative linking NTFDS to reducing the scope &/or duration of PSPS events as well as mitigating wildfire ignition, this technology will be overshadowed by more immediate concerns.

# Challenges for Gridware's Portion of the WMP Filing with Rationale (2/2)

## Lack of Visibility & Understanding

- **Challenge:** NTFDS lacks a defined presence in key documents like the 2024 WMP Verified Application & the 2023 WMP Report. The term "Non-Traditional Fault Detection Sensors" is not defined nor is its role amongst the other grid upgrades (particularly Enhanced Powerline Safety Settings) which may hinder its adoption as an impactful & cost-effective solution.
- **Rationale:** Industry alignment on definitions & capabilities for NTFDS, as well as competitor actions regarding similar technologies are unclear, creating opportunities for industry leadership.

## Need to Address Controversial Plan Elements

- **Challenge:** Controversial aspects of the plan (e.g., significant cost increases & data privacy concerns) may divert attention from NTFDS, which lacks an immediate, tangible benefit for consumers.
- **Rationale:** To gain traction, NTFDS must be positioned as a critical piece of the overall plan, directly addressing these controversies by demonstrating how it can reduce PSPS events, improve grid visibility, & prevent costly repairs & outages.

## Alignment with Competitors & Industry Standards

- **Challenge:** The lack of clarity on whether industry competitors are also including similar sensors or using comparable definitions creates uncertainty. If the industry is not aligned, it may be harder to justify NTFDS as a standard approach.
- **Rationale:** Competitor filings could provide examples of how similar technologies are integrated, & a lack of alignment could make Gridscope seem niche or experimental.

# Engagement Strategy (1/3)

## 1. Colleagues at Gridware

**Goal:** Achieve buy in and resources for the WMP engagement plan and align on internal messaging to maximize success.

### **Plan Coordination:**

- Conduct internal meetings to align behind resourcing the plan.
- Align behind messaging & details for public-facing materials.
- Establish examples with measurable details regarding how Gridware reduces costs compared with alternatives, minimizes wildfire risks, or limits PSPS event impacts to dispel concerns about arbitrary cost increases.

### **Preparation for PUC Engagement:**

- Prepare a FAQ document to ensure consistency in responses to various stakeholders.
- Establish clear company protocol for regulatory/government engagement.

## 2. Xcel Energy

**Goal:** Ensure Gridware's technology is well-positioned within Xcel's overall WMP strategy.

### **Education & Alignment:**

- Conduct targeted discussions with Xcel employees involved in testimony or filings. Emphasize inserting clear language that highlights Gridware's benefits, particularly its ability to enhance real time visibility, integrate with Enhanced Powerline Safety Settings, reduce costs & alleviate PSPS impacts/inspections.
- Do & share the cost-benefit analysis comparing Gridware to alternative technologies, such as AI cameras, Technosylva wildfire modeling, or FireGuard satellite technology. Position Gridware as a complementary or cost-effective choice.

### **Third-Party Support:**

- Get third-party consultants or findings that independently validate the cost-effectiveness & impact of Gridware technology.
- Coordinate with Xcel's regulatory affairs team to include this validation in formal submissions to the PUC.

## Engagement Strategy (2/3)

### 3. Regulators & Their Staff

**Goal:** Educate the PUC & their staff on the critical role of Gridware in wildfire mitigation.

**Direct Engagement:**

- Schedule meetings with PUC staff to present Gridware's cost-effectiveness, backed by data & third-party validation.
- Tailor these discussions to focus on how NTFDS aligns with PUC priorities, such as reducing PSPS events, minimizing cost increases, & improving wildfire risk mitigation.

**Written Comments:**

- Submit written comments that highlight the benefits of the technology without appearing to promote a single company. Frame the argument around industry-wide benefits of adopting cost-effective, scalable solutions like Gridware.

**Focus on Cost Transparency:**

- Emphasize that the proposed costs for NTFDS are supported by evidence & align with broader goals of reducing wildfire risks & PSPS impacts. If possible get PUC to study this for more data.

### 4. Public Advocates

**Goal:** Addressing Public Advocate concerns about wildfire risks, PSPS events, & rising energy costs.

**Leverage Customer Success Stories:**

- Identify key customers who have benefited from Gridware technology & are willing to share their experiences publicly.
- Highlighting real-world examples of how Gridware has reduced wildfire risk & improved grid reliability.

**Provide Cost-Benefit Analysis:**

- Offer a clear comparison of Gridware's affordability versus alternative wildfire mitigation measures, such as undergrounding or AI-based systems, to illustrate its value to consumers.

**Host Briefings:**

- Arrange a dedicated session to educate the Consumer Advocate team on how NTFDS minimizes costs & improves reliability, empowering them with evidence-based insights to strengthen their arguments in the proceeding. Evaluate inviting competitors.

# Engagement Strategy (3/3)

## 5. Industry Stakeholders

**Goal:** Build industry alignment, credibility & demand for NTFDS as a new, strategic industry resource.

### **Coordinate with Various Solution Providers:**

- Share insights & align on definitions, best practices, & outcomes for similar technologies. A united industry stance strengthens the credibility and adoption of NTFDS.

### **Collaborate with Utilities & Trade Associations:**

- Participate in industry working groups to showcase NTFDS as an important tool.

### **Share Research & Development:**

- Collaborate on research projects or pilot programs & promote with whitepapers, blogs, industry publications.

### **Host Briefings:**

- Invite local elected officials to see the deployments in their districts, & understand the benefits.

# Proactive Efforts to Support PUC Adoption of NTFDS in the WMP

## Objective 1: Educate Stakeholders on the Benefits of NTFDS

### Key Results:

- a. Conduct **1-3 meetings with PUC staff** to highlight the cost-effectiveness & wildfire risk mitigation benefits of NTFDS by March 2025.
- b. Secure **2-3 letters of support** from intervening parties, such as the Utility Consumer Advocate & Colorado Solar & Storage Association, by April 2025.
- c. Host **1-2 briefings** with Consumer Advocate stakeholders to align messaging & address concerns about affordability & PSPS impacts by February 2025.

## Objective 2: Amplify Public Support Through Advocacy & Media

### Key Results:

- a. Launch **2 public-facing media campaigns** showcasing customer success stories & NTFDS/Gridscope benefits by April 2025.
- b. Mobilize **~5 public comments** during the public hearing periods, emphasizing the role of NTFDS in wildfire mitigation & affordability.
- c. Publish **2 educational pieces** (e.g., op-eds or blogs) on the benefits of advanced fault detection systems by March 2025.

## Objective 3: Align with Xcel & Intervening Parties to Strengthen Filing

### Key Results:

- a. Provide **2 cost-benefit analyses** to Xcel for inclusion in their Answer & Rebuttal Testimonies by 3/ 21/25.
- b. Facilitate **2+ meetings with industry associations** to align on messaging & showcase NTFDS as an industry-standard technology by April 2025.
- c. Collaborate with Xcel to include **3+ references** to NTFDS capabilities in their formal filings to the PUC.

# Tasks & Timeline to Achieve OKRs

Gridware Tasks to Meet OKRs for WMP

