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February 24, 2026

Sasha Bergman, Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2147

Re: PUC Docket No. E002/M-25-142  
In the Matter of Xcel Energy's Transportation Electrification Plan

Dear Ms. Bergman:

SWTCH respectfully submits these reply comments on the Transportation Electrification Plan (TEP, or Plan) filed by Xcel Energy (the Company) in the above-referenced docket.

### About SWTCH

With more than 15,000 chargers on its network, SWTCH is a leading provider of electric vehicle (EV) charging and energy management solutions for multifamily, commercial, and workplace properties across Minnesota and North America. SWTCH's end-to-end solution optimizes EV charging usage and manages load to benefit drivers, property owners, and the grid. SWTCH's charging management system (CMS) is built on a foundation of open communication standards and interoperability to ensure future flexibility, scalability, and innovation.

### Comments

- 1. Support the Commercial EV Infrastructure Rebate program and associated per-port rebate levels.*

SWTCH supports the proposal to wind down the Fleet, Multi- Dwelling Unit (MDU) and Public Charging pilots and transition these incentives into the more simplified Commercial EV Infrastructure Rebate program. This new program, for which multifamily, workplace, fleet, and other commercial customers will be eligible, takes a more streamlined and flexible approach that is intended to solve for some of the complexity and deployment challenges experienced with the existing pilots.

SWTCH especially appreciates that the Company is recognizing that the market continues to evolve to meet customer needs. Customers demand different deployment and financing models including Charging-as-a Service. SWTCH

commends the Company for building in this flexibility into its new rebate program.

SWTCH also supports the proposed amounts of the stackable EVSI and EVSE commercial rebate per port. The costs for infrastructure, chargers, charging management system (CMS) network service, and ongoing care and maintenance can vary based on a number of factors. The rebate levels in the TEP are appropriately priced to be effective in supporting deployment.

## *2. Require true functional OCPP interoperability.*

SWTCH supports the recommendation of the Alliance for Transportation Electrification (ATE) that “all residential and non-residential EVSE on these lists be compliant with Open Charge Point Protocol (“OCPP”).”<sup>1</sup> SWTCH also shares ATE’s perspective about the value of open standards to support an interoperable and more user-friendly charging ecosystem.

The OCPP protocol (Open Charge Point Protocol) is developed and maintained by the Open Charge Alliance (OCA), a global non-profit EV charging industry foundation dedicated to the advancement of open standards and sustainable charging solutions. It describes the goal of OCPP as follows:

*“The goal of (OCPP) is to provide a uniform method of communication between charge points and central systems. This protocol makes it possible to connect any central system with any charge point, regardless of the vendor. A uniform approach helps prevent coordination problems and therefore benefits the entire electric vehicle market.”<sup>2</sup>*

One way to think about OCPP is as a common interface or language by which different makes and models of chargers can communicate with different back-end networks, often referred to as charging management systems (CMS). As a simple illustration, OCPP enables a CMS to issue a command for a charger to commence a charging session, and the charger will receive and understand that command regardless of its manufacturer.

Providing this common interface is only one aspect of OCPP. The real value of OCPP lies in how it enables a charger to be truly interoperable and avoid becoming a stranded asset. Simply requiring a charger to be “OCPP capable” is inadequate for this. To ensure that chargers are functionally interoperable, the

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<sup>1</sup> Alliance for Transportation Electrification. January 13, 2026. Comments at p. 3.

<sup>2</sup> Open Charge Alliance:

<https://openchargealliance.org/protocols/open-charge-point-protocol/>

hardware provider must enable its charger to operate on multiple networks, without locking it into a particular CMS.

As ATE noted, recent industry experience demonstrates the hazard of lacking true functional interoperability.<sup>3</sup> In the past year, two high-profile North American charging networks announced they were terminating network services for their public-facing chargers. Although these chargers were “OCPP capable” and shared OCPP’s common interface language, the two companies’ back end CMS prevented the chargers’ owners from simply swapping out the original CMS for another. In some cases, owners were able to successfully transfer the units to another CMS, but sometimes the economics led to other results. In many instances the costs that would have been incurred to migrate the unit were not economically feasible for the owners to absorb. As a result, some owners were left with a choice of either “ripping and replacing” the existing units (which were otherwise still functional aside from the unsupported CMS platform) and paying for new units, or simply decommissioning the units without replacing them.

The implications of OCPP interoperability are especially acute for chargers funded by the public (including utility ratepayers). Appropriately, public agencies often take extra precautions to ensure public investments do not become stranded assets. Unfortunately, many of the chargers impacted by these two recent network terminations were publicly funded by various states’ grant programs or utility ratepayers. This precautionary experience is both timely and instructive as the Commission considers the next iteration of the Company’s TEP.

SWTCH recommends that the Company require its funded chargers to support true functional OCPP interoperability by requiring vendors, as part of seeking eligibility for the incentive, to:

1. Provide documentation of OCPP certification (not simply affirm OCPP capability or compliance);
2. Commit that the CMS and firmware do not require owners to pay a penalty or otherwise prevent migration of chargers to other CMS platforms; and,
3. Provide the Company with site and contact information to validate where their hardware is operating on at least three different CMS networks, or, alternatively, their CMS is operating at least three different brands of chargers.

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<sup>3</sup> Alliance for Transportation Electrification. January 13, 2026. Comments at p. 3.

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### In Closing

SWTCH commends the State of Minnesota and the Commission for their ongoing shared commitment to support electric transportation in a thoughtful and well-planned manner via docketed proceedings such as this. Please contact me at [josh.cohen@swtchenergy.com](mailto:josh.cohen@swtchenergy.com) if I can provide more information or if it would be helpful to have a deeper conversation about any of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Josh Cohen", with a long horizontal flourish extending to the right.

Josh Cohen  
Head of Policy