

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

April 7, 2026

**RE: In the Matter of Otter Tail Power’s 2025 Transportation Electrification Plan
Docket No. E017 /M-25-141**

Initial Comments of Fresh Energy, Union of Concerned Scientists, and the Environmental Law and Policy Center.

Fresh Energy, Union of Concerned Scientists, and the Environmental Law and Policy Center (collectively the Clean Energy Groups, or CEGs) submit these Initial Comments in response to the Commission’s November 13, 2025 Notice of Comment Period,¹ focusing on Topics 5-8, Otter Tail Power’s Transportation Electrification Plan (TEP) initially filed on October 31, 2025.² We appreciate the opportunity to participate in this docket and look forward to working with the Commission, Otter Tail Power (OTP), and other stakeholders to improve the proposal to further support transportation electrification efforts in OTP’s service territory in Minnesota.

The CEGs recommend the Commission **approve** the Company’s proposed TEP, but request that OTP offer further information on forthcoming programming in Reply Comments. The information requested will help inform the Commission and stakeholders about how OTP’s plans will help address gaps in transportation electrification to generate equitable outcomes and ensure that any proposed spending maximizes downward pressure on electricity rates. Specifically, we ask OTP to clarify timelines, budgets, and details regarding:

- The development of a Commercial Level 2 (L2) tariff
- The development of a DCFC make-ready program
- Its ECO Triennial Proposal, including information regarding its multifamily and low-income EV charging programs, as well as re-evaluation of existing EV and ESB rebates.

¹ Docket No. E017/M-25-141. [Notice of Comment Period](#) (November 13, 2025) Topics 5-8

² Docket No. E017/M-25-141. [Otter Tail Power’s Transportation Electrification Plan](#) (October 31, 2025).

I. Introduction:

Electric Vehicles (EVs) are a proven technology with demonstrated benefits for consumers, the electric grid, public health, and the climate.³ The Clean Energy Groups have long advocated for prudent yet ambitious utility programs and investments to enable access to electric transportation options for more consumers, particularly people that have not been able to access them due to where they live or the upfront cost of installing the necessary infrastructure to charge at home.

OTP has made significant progress in standing up programs which should make it easier for customers to access electrified transportation options. The CEGs particularly appreciate OTP's leadership in establishing a load control program for EV charging through the *EVantage* Program, filed October 3, 2025, and approved by the Public Utilities Commission on January 29.⁴ This program, like OTP's EV, residential L2 charger, and Electric School Bus (ESB) rebates are to be implemented through the Energy Conservation and Optimization (ECO) program. The CEGs appreciate OTP including some summary information about its plans for transportation electrification spending through the ECO process but ask that **OTP provide further clarification and detail about anticipated ECO spending and programming in its Reply Comments, including information regarding its plans for multifamily and low-income EV charging programs as well as its re-evaluation of existing rebates.**

II. Commercial EV Programming

Providing solutions for both public charging and for private fleets are critical aspects of Otter Tail Power's role facilitating transportation electrification. The CEGs appreciate that Otter Tail Power has begun to work on "adding a commercial level 2 charging rate option" and ask **that Otter Tail Power provide more information on timeline for this rate in its Reply Comments.**⁵ This rate option will help commercial fleets electrify.

The CEGs also appreciate that OTP has indicated interest in assisting the development of the public DCFC market through programmatic changes. The CEGs support extending the revenue guarantee period for Electric Service Agreements beyond three years for EV charging stations, as indicated by OTP in this TEP.⁶ Doing so will lower the risk premium for developers to invest in charging infrastructure in OTP's territory. We believe that this work would be especially beneficial in conjunction with the implementation of a DCFC make-ready program, and ask that **OTP provide detail regarding the timeline, budget, and scope of this potential program.**

³ A more complete summary of the benefits of EVs is available in Appendix A. These benefits are also well documented in previous CEGs filings such as [Initial Comments on Minnesota Power's TEP Supplemental Filing](#) under Docket No. E002/M-23-452 filed in March 2025, as well as our [Initial Comments on Xcel's 2023 TEP](#) under Docket No. E002/M-23-452 filed in December 2023 for additional information.

⁴ Docket No. E017/M-23-380 [Briefing Papers for January 29, 2026 Commission Meeting](#)

⁵ Docket No. E017/M-25-141. [Otter Tail Power's Transportation Electrification Plan](#) (October 31, 2025). Page 2.

⁶ Docket No. E017/M-25-141. [Otter Tail Power's Transportation Electrification Plan](#) (October 31, 2025). Page 3.

The CEGs lament that OTP's grant from the U.S. Department of Energy to support the purchase of eight ESBs was cancelled last year. The CEGs support the continued implementation and refinement of rebates for ESBs through ECO and hope that new opportunities for school bus electrification will emerge in the coming months and years.

III. Residential EV Programming

The CEGs continue to support OTP's implementation of its EV rebates, L2 EV Charger rebates, and the offering of various residential time-of-use (TOU) rates, including a separately metered EV-specific rate. The CEGs also appreciate the recent approval of the *EVantage* program, which should lower the up-front cost of accessing incentives for grid-optimized charging. These offerings are critical to maximizing EV benefits by helping to overcome the upfront cost of adoption and then aligning fueling with periods where the grid is underutilized.

Although the *EVantage* program is an excellent addition to OTP's offerings for residential EV customers, the CEGs contend that there are remaining gaps in OTP's residential EV charging portfolio, most notably for multifamily and low-income customers. The CEGs have long advocated for utility involvement in identifying and implementing solutions to help better serve this customer segment. OTP correctly identifies in its 2023 TEP that multifamily customers face additional hurdles and complications compared to EV charging solutions for single-family settings.⁷ In this TEP, OTP notes that it is reviewing multi-family and low-income electric vehicle charging options to be included in the Company's 2027-2029 ECO plan.⁸ The CEGs welcome that OTP is working on a solution for these customers, and ask that **OTP provide more detail regarding the nature of upcoming ECO programming for multifamily EV and low-income charging in its Reply Comments.**

IV. Equity in EV Programming

Providing solutions for low-income and multifamily customers will make transportation electrification more equitable and help reach more underserved customers, but there remain areas for improvement. The CEGs commend Otter Tail Power's commitment to "educational outreach initiatives" and encourage Otter Tail Power to pursue increased outreach to historically underserved communities, such as Tribal Communities. Otter Tail Power serves several tribal communities, including portions of the White Earth Nation and Leech Lake Reservation, the two most populous Native communities in Minnesota. This outreach to underserved communities should be complemented by offering enhanced EV rebates for low-income customers or those residing in multifamily housing. This structure would follow the structure proposed by

⁷ Docket No. E017/M-23-380. [Otter Tail Power's 2023 Transportation Electrification Plan](#) (November 1, 2023). Pages 56-57.

⁸ Docket No. E017/M-25-141. [Otter Tail Power's Transportation Electrification Plan](#) (October 31, 2025). Page 2.

Minnesota Power in its recently approved ECO EFS Program,⁹ and it helps to address the additional barriers to transportation electrification for these customers. The CEGs also recommend higher rebates be offered for ESBs serving low-income or underserved communities, including Tribal Nations. **The CEGs recommend that OTP offer enhanced rebates for EVs and ESBs for underserved communities in its next ECO Triennial.**

V. Conclusion

OTP's TEP demonstrates a clear commitment towards improving transportation electrification options for its customers. The CEGs appreciate the indications of forthcoming programming, but make the above requests for information on said programming to better inform our advocacy and recommendations. The CEGs look forward to working with OTP in its ECO Triennial on the re-evaluation of existing EV and ESB rebates, multifamily and low-income charging programs, as well as on any future transportation electrification programming put forward to the Commission in coming years, such as the DCFC make-ready and Commercial L2 programs indicated in this TEP.¹⁰

We thank the Commission and OTP for the opportunity to participate in this docket, and look forward to learning more about future programming through Reply Comments.

⁹ Docket No. E015/CIP-23-93 [Decision on Minnesota Power's ECO Modification Request for EFS Programming](#) (February 5, 2026).

¹⁰ Docket No. E017/M-25-141. [Otter Tail Power's Transportation Electrification Plan](#) (October 31, 2025). Page 3.

Sincerely,

/s/ Nicholas Haeg

Fresh Energy
408 St. Peter Street, Suite 350
St. Paul, MN 55102
320.291.8556
haeg@fresh-energy.org

/s/ Susan Mudd

Environmental Law and Policy Center
35 E Wacker Dr., Suite 1600
Chicago, IL 60601
414.232.4359
smudd@elpc.org

/s/ Maria Cecilia Pinto de Moura

Union of Concerned Scientists
1825 K Street NW, Suite 800
Washington, DC 20006
347.255.1042
mcpmoura@ucs.org

/s/ Sam Houston

Union of Concerned Scientists
1825 K Street NW, Suite 800
Washington, DC 20006
202.331.5459
shouston@ucsusa.org

Appendix A: Benefits of Transportation Electrification

Electric vehicles continue to provide climate, health, and grid benefits, with many of these benefits becoming more clear since the Commission's initial investigation into electric vehicles.¹¹ Below these benefits are summarized and updated with the latest findings.

Greenhouse Gas Reduction

Numerous independent studies spanning well over a decade have come to the same conclusion: reducing global warming pollution to the levels required to avoid the worst impacts of climate change will require a dramatic shift to EVs powered by renewable and other zero-carbon energy sources.¹² EVs are cleaner than gasoline and diesel vehicles today and will become even more so as the energy mix used to make and charge the vehicles continues its transition from fossil fuels to cleaner sources.¹³

A report by research firm MJ Bradley & Associates (now ERM) found a mass market for light-duty EVs consistent with meeting the state's long-term greenhouse gas reduction goals would reduce annual greenhouse gas emissions in Minnesota by over 17 million tons per year for light-duty vehicles alone, leading to \$10.4 billion cumulative net benefits from greenhouse gas reductions by 2050.¹⁴

Public Health

In addition to reducing greenhouse gas emissions and the associated climate impacts, electrifying transportation would have tremendous public health benefits by reducing local air pollution. In their 2022 "Life and Breath Report: Greater Minnesota," the Minnesota Department of Health and Pollution Control Agency found adverse health impacts from fine particles and ozone pollution in several cities in Greater Minnesota.¹⁵ The report also found that communities in

¹¹ Minnesota Public Utilities Commission, Docket No. CI-17-879. [Order Making Findings and Requiring Filings](#), February 1, 2019.

¹² See, e.g., Pinto de Moura, Maria Cecilia, 2022, [Low Carbon Pathway for Transportation: Ramping up vehicle electrification and phasing out petroleum](#), Union of Concerned Scientists, Williams, J.H. et al., "Pathways to Deep Decarbonization in the United States," Energy and Environmental Economics, Inc. (E3), November 2014; Williams, J.H. et al., "The Technology Path to Deep Greenhouse Gas Emissions Cuts by 2050: The Pivotal Role of Electricity," Science 335, no. 6064 (January 2012): 53-59; Melaina, M. and K. Webster, "Role of Fuel Carbon Intensity in Achieving 2050 Greenhouse Gas Reductions within the Light-Duty Vehicle Sector," Environ. Sci. Technol. 45, no. 9 (2011): 3865–3871; International Energy Agency, "Transport, Energy, and CO2: Moving Towards Sustainability," OECD/IEA, 2009; National Research Council, "Transitions to Alternative Vehicles and Fuels," (Washington, D.C.: The National Academies Press, 2013).

¹³ Reichmuth, David, May 2024, ["Driving on Electricity is Now Much Cleaner than Driving a Gasoline Car"](#), Union of Concerned Scientist, *The Equation*.

¹⁴ M.J. Bradley & Associates, July 2018, ["Plug-in Electric Vehicle Cost-Benefit Analysis: Minnesota"](#), (hereinafter MJB&A Analysis)

¹⁵ Minnesota Department of Health and Minnesota Pollution Control Agency, 2022, [Life and Breath: Greater Minnesota](#).

these cities with higher percentages of “low-income residents, Black, Indigenous or People of Color residents, uninsured residents, or residents living with a disability have the highest estimated air pollution-related death and disease rates,” and estimated that air pollution contributed to 62 early deaths in Duluth in 2015.¹⁶ A 2020 study from the Union of Concerned Scientists found that state-wide, African Americans and Latino residents are exposed to road vehicle PM 2.5 levels that are 65% and 28% higher, respectively, than the average Minnesotan resident, while White residents are exposed to levels that are 9% lower than the average.¹⁷

Swapping gas and diesel vehicles for EVs helps alleviate some of this air pollution, particularly in the more densely populated urban areas where their impacts are most concentrated. MJ Bradley & Associates estimate that EV adoption consistent with meeting the state’s long-term greenhouse gas reduction goals could provide cumulative \$700 million in health and other societal net benefits from reduced emissions of nitrogen oxides (NOx, a precursor to smog and fine particulate matter pollutant¹⁸) by 2050.¹⁹

Grid Services

EVs have great potential to enhance the efficient use of grid resources and provide grid services, including the incorporation of renewable energy, through both smart charging and, in some cases, power export. Grid efficiency and services from EVs will lead to benefits for all utility customers, and successful implementation of utility EV programs and rate options can both accelerate transportation electrification and enhance the benefits those EVs can offer. According to the MJ Bradley & Associates analysis, the deployment of EVs consistent with the state’s long-term goals could lead to \$10.2 billion in reduced electric bills for customers by 2050.²⁰ Analysis completed in June 2024 by Synapse Energy Economics with the Natural Resources Defense Council show these benefits are already being realized, with EVs providing an estimated \$16.9 million in net revenue to all utility customers in Minnesota between 2011 and 2021.²¹

In total, the MJ Bradley & Associates analysis finds that light-duty EVs adoption consistent with meeting the state’s long-term greenhouse gas reduction goals could provide cumulative net benefits of over \$30 billion to the state of Minnesota by 2050, with greenhouse gas reduction, NOx reductions, customer bill savings, and EV driver operating cost savings taken together.²²

¹⁶ *Id.* at Table 1

¹⁷ Moura, February 2020, “[Who Breathes the Dirtiest Air in Minnesota?](#)”

¹⁸ O’Dea, Jimmy. “[Ready for Work](#)” Union of Concerned Scientists, December 2019. Page 2.

¹⁹ MJB&A Analysis

²⁰ *Id.*

²¹ Synapse Energy Economics, [EVs Are Driving Rates Down For All Customers](#), June 2024. Page 14.

²² *Id.*