

September 20, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-20-745

Dear Mr. Seuffert:

Attached are the Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

In the Matter of Xcel Energy's Petition for Approval of Electric Vehicle Programs as part of its COVID-19 Pandemic Economic Recovery Investments

Based on the initial comments of parties and the reply comments of Xcel Energy, the Department recommends that the Minnesota Public Utilities Commission (Commission) **approve Xcel's Petition with modifications**. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Analyst Coordinator

CTD/ja
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-20-745

I. INTRODUCTION

During its May 7, 2020 meeting discussing Docket No. E,G-999/CI-20-425, *In the Matter of an Inquiry into the Financial Effects of COVID-19 on Natural Gas and Electric Utilities*, the Minnesota Public Utilities Commission (Commission) requested that its Executive Secretary issue a notice requesting information from the regulated utilities to identify investments and utility projects that could assist Minnesota's economic recovery from the COVID-19 pandemic.

On May 20, 2020, the Commission issued a *Notice of Reporting Required by Utilities* to all rate regulated electric and gas utilities, requiring an initial report by June 17, 2020. The Notice required that the reports include the following information:

- For all rate-regulated electric and gas utilities, please provide a list of all ongoing, planned, or possible investments that meet the following conditions:
 - Provide significant utility system benefits;
 - Are consistent with approved resource plans, approved natural gas distribution infrastructure or pipeline safety plans, triennial conservation plans, and existing Commission orders;
 - Reduce carbon or other pollutant emissions in the power sector or across economic sectors;
 - Increase access to conservation and clean energy resources for Minnesotans;
 - Create jobs or otherwise assist in economic recovery for Minnesotans; and
 - Use woman, veteran, or minority owned businesses as much as possible and provide documentation of these efforts.
- For each of the listed investments, please provide a brief description about how the investments meets the above conditions. Please provide an estimate of the time period for initiating and completing each project and the project costs.

In the docket created to collect that information, Docket No. E,G-999/CI-20-492 (Docket 20-492), utilities filed reports on June 17, 2020. The Commission held a planning meeting on July 29, 2020 to discuss next steps in its inquiry into utility investments that may assist in Minnesota's economic recovery. On August 12, 2020, the Commission issued a notice directing utilities to file proposals for an initial tranche of investments that would begin construction in 2021, along with proposed rate mitigation strategies, if applicable. The due date for the utility proposals was September 15, 2020, with initial comments due on October 16, 2020, and reply comments due on Oct. 30, 2020.

On September 10, 2020, Xcel Energy proposed its Multi-Dwelling Unit (MDU) Electric Vehicle Pilot Program in response to the Commission's December 12, 2019 Order. The proposal was filed in Docket No. E002/M-20-711.

On September 16, 2020, Xcel Energy filed its *Petition for COVID-19 Relief and Recovery (Xcel Covid Petition)*, which included a suite of electric vehicle (EV) offerings along with other investments, detailed in Attachment C to the petition. The petition was filed in multiple dockets, in addition to Docket No. E,G-999/CI-20-492. Xcel's proposed EV programs included:

- A public fast charging station proposal
- Electrification of Xcel's fleet
- A modification to Xcel's already approved Fleet EV Infrastructure Pilot (Docket 18-643), and
- Rebates for light duty vehicles (LDV), transit bus, and school bus electric vehicles

On September 25, 2020, the Commission issued a *Notice of Comment Period* (September 25 Notice) requesting comments on the procedural steps the Commission should take in evaluating Xcel's EV proposals. Given the historically high level of interest in Xcel's EV proposals and diverse set of stakeholders, Commission Staff proposed to evaluate Xcel's suite of EV investments proposed in Docket 20-492 as a separate package, and included Xcel's recently proposed Multi-Dwelling Unit pilot (Docket No. E002/M-20-711) on the same procedural path. Commission Staff also requested comments in Docket 18-643, as one of Xcel's proposals included a modification to an existing component of an EV pilot program approved in that docket. Commission Staff requested that parties initially comment on the completeness of individual proposals as filed, along with any other procedural considerations, and indicated that a subsequent notice would be issued on the merits of various proposals after any procedural questions are resolved.

Between October 16, 2020 and October 21, 2020 several parties commented in Docket No. E002/M-20-745, *In the Matter of Xcel Energy's Petition for Approval of Electric Vehicle Programs as Part of its COVID-19 Pandemic Economic Recovery Investments*. The parties included:

- Clean Energy Groups (Fresh Energy, Minnesota Center for Environmental Advocacy, Natural Resources Defense Council, Sierra Club, Union of Concerned Scientists, and Plug In America);
- Greenlots;
- Ironworkers Local 512;
- Metro Transit;
- Office of the Attorney General, Residential Utilities Division (OAG-RUD);
- the Department;
- Tesla, Inc.;
- Citizens Utility Board of Minnesota (CUB);
- LIUNA Minnesota and North Dakota (LIUNA); and
- Greater St. Cloud Development Corporation.

Of this group, the Department, the Clean Energy Groups, and the OAG-RUD responded most directly to the question of how the Commission should proceed in regards to Xcel's proposed EV projects.

The Clean Energy Groups recommended that the Commission establish three proceedings with the following timelines:

- 1) Multi-Dwelling Unit EV Pilot Filing (Docket No. E002/M-20-711) should be considered first, as early as November 20, 2020;
- 2) Public Fast Charging, acceleration of Xcel Energy's fleet electrification, and expansion of existing EV Fleet Pilot Service ("non-rebate EV Economic Recovery proposal") (Docket Nos. E002/M-18-643 and E002/M-20-745) should proceed second, with initial comments due in December 2020; and
- 3) EV Purchase Rebates (Docket no. E002/M-20-745), should proceed third, with initial comments due January 2021.

The Department recommended that, at a minimum, Xcel should submit the additional information identified both by Commission Staff in its September 25 Notice and by the Department in its initial comments.

The OAG-RUD stated that having signaled its specific interests, the Commission should allow utilities to bring forward any proposals that require regulatory approval and should evaluate each proposal on its merits using the factors set forth in statute and rule.

On January 11, 2021, Xcel submitted cost-effectiveness analyses of all electric vehicles forecasted to be adopted in Minnesota during the period 2020 through 2030, and of vehicles forecasted to be adopted due to Xcel's proposed EV Rebate project.

On February 10, 2021, the Commission issued its *Notice Requesting Additional Information* (Additional Notice). The Additional Notice requested that Xcel provide specific additional information by February 22, 2021 or explain why the information is not available.

On March 8, 2021, in response to the Commission's Additional Notice, Xcel submitted Supplemental Comments.

On June 4, 2021, Xcel submitted an errata to its January 11, 2021 EV cost-effectiveness analysis.

On June 9, 2021, the City of St. Paul submitted a Letter of Support.

On June 10, 2021, the Minnesota Department of Transportation submitted a Letter of Support, specifically for the rebates for electric transit buses.

On June 21, 2021, the Department, Chargepoint, Inc. and Clean Energy Groups (Fresh Energy, Minnesota Center for Environmental Advocacy, Plug-In America, Sierra Club, and Union of Concerned Scientists) submitted initial comments on Xcel's proposed modification to its existing EV Fleet Pilot Service program in Docket No. E002/M-18-643.

On July 2, 2021 the Commission approved Xcel's Petition for Approval of its MDU EV Pilot Program in Docket No. E002/M-20-711.

On July 12, 2021, LIUNA submitted a Letter of Support.

On August 3, 2021, the Minnesota Department of Administration submitted a Letter of Support.

On August 5, 2021, the Minnesota Pollution Control Agency submitted a Letter of Support.

On August 26-27, 2021, the following parties submitted initial comments:

- Greenlots;
- Office of Attorney General-Residential Utilities Division (OAG-RUD);
- Tesla;
- Chargepoint; and
- Fresh Energy, Sierra Club, Union of Concerned Scientists, and Plug in America (Clean Energy Groups or CEGs).

II. DEPARTMENT INITIAL COMMENTS

In our August 26, 2021 initial comments, the Department recommended the following:

For Reply Comments, the Department recommends that Xcel briefly discuss how many non-Xcel-owned DCFC chargers have been added to its system over the past year.

The Department makes the following recommendations regarding Xcel's proposals.

A. EV PURCHASE REBATES

The Department recommends that the Commission approve:

1. A \$5 million Equity Rebate program with the following components:
 - a) A rebate of \$5,500 for new light duty electric vehicles (LDEVs) and \$3,000 for used LDEVs to be used for either purchasing or leasing the vehicles.

- b) To determine whether a customer is income qualified, the Department recommends that Xcel use multiple verifiable federal, state and utility eligibility standards, such as:
- Head Start;
 - The Minnesota Family Investment Program (MFIP);
 - Minnesota’s Temporary Assistance for Needy Families (TANF) program;
 - Low-Income Heating Energy Assistance Program (LIHEAP);
 - Low-Income Weatherization Assistance Program (WAP); and
 - Solar*Rewards Income Eligible.
2. An electric bus rebate budget of \$30 million to cover:
- a) The incremental cost (\$810,000) of 30 electric, 40-foot transit buses for Metro Transit;
- b) \$5.7 million to provide rebates to school districts to cover incremental costs of electric school buses and infrastructure upgrades for charging.
3. A tracker account for Xcel to recover the rebate and administrative costs of the EV rebates, and that applies Xcel’s cost of short-term debt to unrecovered balances.

In addition, the Department recommends that the Commission request additional input from parties once the fate of the Infrastructure Investment and Jobs Act is known.

B. PUBLIC FAST CHARGING

The Department recommends that the Commission approve Xcel’s Public Fast Charging Proposal, with the modification that at the conclusion of its pilot program, Xcel must make a compliance filing that addresses divestment issues and identifies possible divestment strategies.

C. FLEET ELECTRIFICATION

The Department recommends that the Company submit testimony in its next rate case to support the project, and also address the higher EV fleet vehicle capital costs, lower maintenance costs, and overall net benefits to ratepayers.

III. DEPARTMENT RESPONSE TO PARTY INITIAL COMMENTS AND XCEL REPLY COMMENTS

The Department appreciates the thoughtful discussion of how to accelerate transportation electrification in Xcel Energy’s service territory. Below, the Department responds to comments concerning:

- The cost-effectiveness of Xcel's proposed rebates for LDEVs;
- Cost recovery;
- Proposed levels of LDEV rebates;
- Proposed levels of electric bus rebates;
- Public Fast Charging proposal;
- Xcel Fleet Electrification acceleration.

A. COST-EFFECTIVENESS OF XCEL'S PROPOSED LDEV REBATES

1. OAG and Department Comments

Both the Department and OAG-RUD pointed out that the revised benefit-cost analysis (Revised BCA) conducted by Xcel's consultant, Energy and Environmental Economics (E3) showed that Xcel's \$50 million LDEV rebate proposal would make ratepayers and society worse off than without the rebates. Specifically, Xcel's \$50 million proposal would result in \$5 million less in benefits to ratepayers, and \$26 million less to society, as compared to the base case.

2. Xcel Response

In response, Xcel stated that the difference in net benefits between its proposal and the base case were only one percent in regard to the ratepayer test and seven percent in regard to the societal test. Further, Xcel stated that it is reasonable to assume that its LDEV rebate program could result in the market penetration for EVs beyond the rebate period could be even larger.

3. Department Reply

Cost-effectiveness analysis of a given measure requires that one determine an appropriate baseline to compare the results of the measure to. In Xcel's Revised BCA, the Base Case is referred to as the "Personal LDV—managed charging case". The Revised BCA refers to the measure being evaluated—Xcel providing \$50 million in LDEV rebates—as the "Personal LDV-Constrained rebate program, managed charging" case. This case is similar to the Base Case except it includes Xcel's proposed \$50 million in LDEV rebates.

In its Revised BCA, Xcel did not provide the reader with the most important calculation—the comparison of the net benefits resulting from Xcel's proposed \$50 million LDEV rebates to the Base Case. Table 1 below shows this calculation.

**Table 1: Comparing Net Benefits of Xcel’s LDEV Base Case (No Rebates)
With Total Net Benefits When Xcel’s \$50 Million LDEV**

	Ratepayer	Driver	Societal
Xcel \$50 Million LDEV Rebates	\$335	\$65	\$340
Electric LDV Base Case	\$339	\$26	\$366
Difference	(\$4)	\$39	(\$26)

Table 1 shows that Xcel’s proposed \$50 million in LDEV rebates is not cost-effective to ratepayers and is not cost-effective to society. Xcel’s proposal would cost ratepayers (i.e., increase upward pressure on rates) \$4 million. Xcel’s proposal would cost society \$26 million.¹

In its Reply comments the Company conjectures that its LDEV rebate program could lead to higher benefits than estimated. This potential is a form of free ridership, where an incentive results in higher impact than indicated by the number of customers purchasing an item who receive the incentive. One example could be where a customer learns about an incentive and decides to purchase an item, but then never applies for the incentive. Free ridership is a possibility in many programs. However, Xcel’s initial filing and reply comments failed to discuss the possibility that a significant number of participants in its potential rebates program would be free riders, i.e., the rebate recipients would have purchased the LDEVs without the rebates.²

Not only is the Department skeptical of Xcel’s conjecture that its LDEV rebate program could lead to higher benefits than estimated, the Department is also concerned that Xcel’s estimates of the net benefits of the LDEV rebate program may be overstated.

In the Conservation Improvement Program (CIP), the Department makes a simplifying assumption and does not adjust its reporting of energy savings for what is called the net-to-gross factor (NTG). Instead utilities and the Department report gross savings. Estimates of gross savings reflect the changes in energy consumption and/or demand that result from program-related actions taken by participants in an efficiency program, regardless of why they participated. In contrast, a net savings approach measures the changes in energy consumption/demand that are specifically attributable to or are a direct result of a particular energy efficiency program that would not otherwise have happened in the absence of the program. Two major differences between gross energy savings and net energy savings are free ridership—an estimate of the number of conservation program participants that would have invested in energy efficient technologies and processes absent the program, and free drivership—an estimate of the number of participants that invested in energy efficient technologies because they

¹ The Department also notes that it is incorrect to interpret the net benefits shown for the \$50 million LDEV rebates in the societal and ratepayer impact tests to mean that Xcel’s proposal is still cost-effective.

² The Department is not aware of any studies of free ridership or free drivership regarding LDEV rebates or tax credits.

were influenced by the program but did not participate in the program. A net-to-gross factor represents the fraction that is multiplied by gross savings to estimate the energy savings attributable to a utility energy efficiency program.

Since Minnesota utilities report their gross savings in CIP, the effects of free riders and free drivers are not estimated. In its 2020 State Energy Efficiency Scorecard³, the American Council for an Energy Efficient Economy (ACEEE) stated that it calculated a median NTG factor of 0.825 for natural gas projects and 0.846 for electric projects. That is, ACEEE estimates that for every 1,000 participants in an electric energy savings measure, only 846 participants were influenced by the program, including the impact of free riders and free drivers. The Department points out this issue because providing rebates for electric vehicles could easily result in a significant amount of free ridership. Applying the 2020 NTG factor for electric energy savings of 0.846 would mean that Xcel's Revised BCA would result in a reduction in net benefits of \$51.6 million than currently for the ratepayer impact test⁴ and \$52.4 million for the societal test⁵. The difference in net benefits between the LDEV rebates case and the base case would decrease from negative \$4 million to negative \$56 million per the ratepayer test, and from negative \$26 million to negative \$78 million per the societal test. Thus, the Department disagrees with Xcel's contention that E3's assumptions were "conservative."⁶ Overall, the Department concludes that Xcel's LDEV rebates program may be even less cost-effective than Xcel's own analysis shows. Given that sales of electric vehicles are already expected to grow due to an increased number of available models, increased availability of public charging, and increased consumer knowledge and excitement about electric vehicles the NTG factor for providing incentives for LDEVs could be much lower than ACEEE's estimates for gas and electric energy savings projects.

B. COST RECOVERY

1. Department, OAG-RUD and CEG recommendations

a.) Department Initial Comments

In our initial comments the Department recommended that the Commission approve, "A tracker account for Xcel to recover the rebate and administrative costs of the EV rebates, and that applies Xcel's cost of short-term debt to unrecovered balances."

³ [The State Energy Efficiency Scorecard | ACEEE](#)

⁴ $1 - 0.846 = 0.154$. $0.154 \times \text{ratepayer net benefits of } \$335 \text{ million} = \$51.6 \text{ million reduction in ratepayer net benefits.}$

⁵ $1 - 0.846 = 0.154$. $0.154 \times \text{societal net benefits of } \$340 \text{ million} = \$52.4 \text{ million reduction in societal net benefits.}$

⁶ Xcel Reply Comments, page 2.

The Department noted that in its response to OAG-RUD IR No. 3, Xcel defended its decision to propose regulatory asset cost recovery.

The Company stated, in part:⁷

The Company does not support a program design that would treat rebates as expenses in response to the Commission's request for proposals. This is because treating the rebates as expenses would create upward pressure on electricity rates, would not align the stream of benefits from additional EV adoption with the timing of the costs, and would not create equal footing between Company-owned infrastructure to support transportation electrification and rebates as other states have done.

The Department responded to Xcel's arguments in our initial comments. In its Reply Comments, Xcel repeated the same arguments, but did not respond to the Department's critique of them, so we summarize our critiques here. First, we stated that since the Department proposed a maximum of \$35 million of rebates spread over several years, the Department was not concerned about upward pressure on rates.

Second, we noted that Conservation Improvement Program (CIP) costs are expensed and the investor-owned utilities have not brought up the issue that the stream of benefits from additional CIP investments would not align with the timing of the costs (Xcel referred to this as intergenerational inequity), nor have they raised any concerns about receiving their lucrative Shared Savings DSM financial incentive mechanism payments in one lump sum instead of being spread out over the lifetimes of the CIP investments.

Third, the Department noted that Xcel's statement about how other states had allowed a utility to rate base LDEV rebates was misleading; only Colorado has allowed rate-basing EV rebates, and it did so for Xcel Colorado, and only for \$5 million of income-qualified rebates.

b.) OAG-RUD Initial Comments

The OAG-RUD recommended that Xcel treat the rebates as operating expenses rather than utility infrastructure as Xcel proposed.

⁷ Department Initial Comments, pages 21-22.

c.) CEG Initial Comments

In its initial comments, CEGs recommended that Xcel provide a rates impact analysis of its proposed cost recovery as well as any cost recovery methods proposed by other parties in the initial comments (e.g., the Department of Commerce) in its utility reply comments.⁸

2. Xcel Reply Comments

In its Reply Comments, the Company stated:

The Department's proposal would artificially limit our recovery to only our short-term debt rate. We know of only a few examples of the Commission limiting the rate of recovery on utility investment to the cost of short-term debt, and in those situations, the Commission has generally done so for punitive reasons or because a project is recovered through a rate rider.⁸ Neither is applicable here.

Part of Xcel's response to CEG's recommendation included a rate impact analysis based on \$40 million of rebates. When it compared revenue requirements of capitalizing vs. expensing the \$40 million of EV rebates the Company used a net present value approach. Xcel stated that the results of its analysis were that the difference between the two methods was less than one percent.

3. Department Reply

The Department notes that the expense tracker proposed by the Department would recover Xcel's EV rebate expenses in a similar manner as CIP expenses are recovered. The Company's cash outlays for rebate payments would be recovered in the year they are incurred. Thus, the Company would not be financing those rebate payments, and there would be no need to apply carrying charges at the Company's full weighted average cost of capital. As in CIP, to the extent the Company under-recovers rebate expenses in a given year, the unrecovered balance would be collected in the following year, with Xcel's cost of short-term debt applied as a carrying charge, reflecting the short-term nature of the unrecovered balance.

In Xcel's last Renewable Energy Standard Rider, Docket No. E002/M-19-732, the Commission ordered Xcel to use the 2021 costs of long- and short-term debt proposed in its subsequently withdrawn 2019 Rate Case (Docket No. E002/GR-19-564.) The short-term cost of debt was 2.99%. In its withdrawn 2020 Rate Case, Xcel proposed significantly lower short-term costs of debt, as shown in Table 2 below.

⁸ Xcel inadvertently stated that the Department requested the rate impact analysis.

**Table 2: Xcel's Proposed 2021-2023 Short-Term Cost of Debt
Proposed in Xcel's 2020 Rate Case⁹**

Year	Short-term cost of debt
2021	0.81%
2022	1.83%
2023	1.03%

Neither the Department nor the Commission has considered the CIP cost recovery mechanism as punitive, instead the approach has been recognized as an incentive because the Company knew it would receive recovery of its expenses. The Department believes that recovering EV rebates in the same way as CIP expenses is reasonable.

The Department recognizes that many of Xcel's charging infrastructure costs may eventually become regulatory assets. However, we continue to maintain that EV rebates are expenses and allowing cost recovery as if they were regulatory assets is expensive to utility customers. As we noted in our initial comments, under Xcel's proposal, ratepayers would pay \$1.36 for every \$1.00 in rebates. Xcel's original proposal of \$150 million in LDEV and electric bus rebates would have cost \$204 million. Even at Xcel's lower proposed \$40 million of rebates for LDEVs and electric buses, the Company's proposed regulatory asset cost recovery would cost customers an additional \$14.4 million.¹⁰ These ratepayer funds could be better spent on infrastructure that will promote the public good, such as public charging.

As for Xcel's analysis showing that the net present value of the capitalizing cost recovery only being one percent higher than expensing, Xcel's analysis is based on using the Company's weighted average cost of capital (WACC) as its discount rate for calculating the net present value of its regulatory asset cost recovery proposal.¹¹ Very few of Xcel's customers have a discount rate in the range of 7.35 percent.¹² In CIP, the participant discount rate for residential customers is 3.02 percent.¹³ Xcel's

⁹⁹ Direct Testimony and Schedules, Sarah W. Soong, Before the Minnesota Public Utilities Commission State of Minnesota, In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota, Docket No. E002/GR-20-723 Exhibit ___(SWS-1) Capital Structure, Overall Rate of Return And Investor Relations. November 2, 2020. Pages 4-5.

¹⁰ \$40 million times 1.36 = \$54.4 million. \$54.4 million - \$40 million = \$14.4 million.

¹¹ In its Reply Comments, Xcel noted that its revenue requirement analysis was based on EV rebates of \$40 million.

¹² Id. Table 1, page 4. Direct Testimony and Schedules of Sarah W. Soong, Before the Minnesota Public Utilities Commission State of Minnesota, In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota Docket No. E002/GR-20-723 Exhibit ___(SWS-1) Capital Structure, Overall Rate of Return And Investor Relations November 2, 2020. Table 1, page 4.

¹³ The discount rate reflects a residential customer's likely opportunity costs (i.e., the return on investment that a residential customer would likely give up in to invest in CIP). It's the Societal Discount rate, which was calculated using the

proposal of capitalizing and amortizing EV rebates would result in costs to ratepayers longer into the future. The lower the discount rate, the higher the present value of future costs, in this case, rates charged customers. Using the lower discount rate in the net present value calculation of Xcel's proposed rate recovery would substantially increase the cost to ratepayers as compared to the cost of expensing to ratepayers because the costs in later years are not discounted as much.

In addition, it is unclear what short-term cost of debt that Xcel used for calculating the total costs under the Department's proposed expensing cost recovery. As shown above, recent short-term costs of debt range from 0.81 percent to 2.99 percent. Using a more recent short-term cost of debt for unrecovered balances will result in the calculation of a much lower net present value for the Department's proposed cost recovery. Given that Xcel underestimated the calculation of the cost of its proposed cost recovery to residential customers and may have overestimated the cost of the Department's proposed cost recovery, the Department concludes that the Company's analysis is not valid.

Finally, in our initial comments, the Department recommended that the Company's administrative costs be included in the tracker. However, the Department notes that administrative costs are not usually incremental costs and there is a representative level of these costs built in base rates. Thus, the Department concludes that the Company's overall administrative costs be determined in its next rate case and that the Commission does not start with the assumption that administrative costs for this program are incremental.

4. Department Recommendation

The Department recommends that the Commission allow Xcel to incorporate an expense level in its upcoming five-year rate plan rate case and using a tracker account. The tracker account would allow the Company and Commission to track the Company's actual rebate expenses and revenues recovered in rates via the rate case. Unrecovered balances would earn the Company's updated short-term cost of debt. Additionally, any over recovery of costs would also earn the Company's short-term cost of debt. In its next rate case, Xcel should propose representative expenses for the EV rebates and administrative costs as well as an annual tracker and a true-up mechanism.

C. LDEV REBATES

1. Initial Comments

The Department recommended approval of a \$5 million point-of-sale, income-qualified Equity Rebate program with the following components:

- a) A rebate of \$5,500 for new LDEVs and \$3,000 for used LDEVs to be used for either purchasing or leasing the vehicles.
- b) To determine whether a customer is income qualified, the Department recommends that Xcel use multiple verifiable federal, state and utility eligibility standards.

The CEGs recommended that the Commission:

Approve a \$5 million light-duty EV rebate program for income-qualified residential customers.

- a) "Income-qualified" should be defined with flexibility and paired with existing low-income services to ease program implementation.
- b) Per-vehicle rebates should be \$5,000 for new EVs and \$3,000 for used EVs for the duration of the rebate program, unless modified by a stakeholder advisory group and approved by community representatives in the advisory group.
- c) Rebates may be paired with managed charging if such an option is available to rebate recipient, but should not be required for recipients without access to managed charging.

CEGs also recommended that the Commission approve:

A \$5 million LDEV rebate program for less-resourced non-residential customers (including nonprofits, non-state governmental entities, and commercial entities like small business).

- a) Per vehicle rebates should be \$1,000 for new EVs and \$500 for used EVs through the duration of the rebate program, unless modified by a stakeholder advisory group.
- b) Rebates may be paired with managed charging if such an option is available to rebate recipient, but should not be required for recipients without access to managed charging.

OAG-RUD recommended that the Commission not approve Xcel's proposed EV rebates, but that if it did, to scale back the proposed rebates to \$5 million for LDEVs and \$10 million for electric buses.

2. *Xcel Reply Comments*

In its Reply Comments, the Company stated that while it still believes that the state and its customers would benefit most from its originally proposed \$150 million in EV rebates, the Company is not opposed to starting with the narrower focus on income-qualified and less-resourced customers represented by both the CEGs and Department's recommendation of \$5 million for income-qualified customers and the CEGs' recommendation of an additional \$5 million in rebates for non-residential nonprofits, non-state governmental entities, and small businesses. Xcel also estimated a three-year budget of at least \$0.5-1 million would be appropriate to support community outreach and customer income-verification which could also support outreach to small businesses, nonprofits, and government entities if rebate eligibility is not restricted to only residential customers.¹⁴

The Company also stated it would be appropriate to consider future modifications and expansions of the vehicle purchase rebate program in its next biennial Transportation Electrification Plan (TEP) on June 1, 2023.

As for rebate levels, Xcel recommended that the Commission approve the rebate levels suggested by the Department for income-qualified customers of \$5,500 for new vehicles and \$3,000 for used vehicles. (CEGs proposed \$5,000 for new vehicles and \$3,000 for used vehicles.) In addition, for non-residential customers, the Company recommended \$2,500 rebates for new EVs and \$1,250 for used EVs, as initially proposed, but \$5,500 for new vehicles and \$3,000 for used vehicles for public entities.

3. *Department Reply*

The Department agrees with the CEGs recommendation to provide rebates for less-resourced groups of small businesses, non-profits and non-state governmental entities. The Department notes that Xcel supported the concept as well, but recommended higher rebates than the CEGs.

The Department is concerned with the CEGs recommendation that income qualified customers be allowed to participate if they have no access to managed charging. One of the strongest components of Xcel's proposal was that all rebated EVs must be charged off peak. However, Xcel concluded:

We are open to exploring simple solutions that would exempt some income-qualified customers from the managed charging requirement if they do not have access to home charging, do not have the ability to charge their vehicle on their existing Xcel Energy account, and/or believe that charging off-peak would create a burden for them given household preferences or work schedules.

¹⁴ Xcel Reply Comments, page 10.

The Department is open to discussing simple solutions with Xcel and other parties.

However, the Department does not support allowing the non-residential, less resourced customers to participate in the program if they have no access to managed charging.

Finally, the Department is concerned by Xcel's suggestion that

4. Department Recommendations

The Department recommends that the Commission:

- a.) Approve a \$5 million point-of-sale income-qualified Equity Rebate program for residential customers with the following components:
 - i. A rebate of \$5,500 for new LDEVs and \$3,000 for used LDEVs to be used for either purchasing or leasing the vehicles.
 - ii. To determine whether a customer is income qualified, the Department recommends that Xcel use multiple verifiable federal, state and utility eligibility standards.
- b.) Approve a \$5 million non-residential LDEV rebate program for non-residential nonprofits, non-state governmental entities, and small businesses with the following rebates:
 - i. Rebates for non-profits and small business of \$2,500 for new LDEVs and \$1,250 for used LDEVs, and
 - ii. Rebates for non-state governmental entities of \$5,500 for new vehicles and \$3,000 for used vehicles .
- c.) Require Xcel to submit a filing providing more detail and explanation for why \$0.5-1 million would be reasonable to support community outreach and customer income-verification which could also support outreach to small businesses, nonprofits, and government entities if rebate eligibility is not restricted to only residential customers.

D. ELECTRIC BUS REBATES

1. Initial Comments

The Department recommended an electric bus rebate budget of \$30 million to cover:

- a) The incremental cost (\$810,000) of 30 electric 40-foot transit buses for Metro Transit;
- b) \$5.7 million to provide rebates to school districts to cover incremental costs of electric school buses and infrastructure upgrades for charging.

The CEGs recommended that the Commission:

Approve a \$30 million bus EV rebate program, with \$20 million to Metro Transit; \$5 million for other transit providers; and \$5 million for school bus operators.

- a) Rebate amounts should cover the incremental cost of an electric bus over an equivalent fossil-fueled bus, including costs related to charging infrastructure
- b) Program should prioritize deployment of electric buses in BIPOC and low income communities and those most burdened by transportation pollution
- c) Ensure that the base MSRP cap of \$50,000 for light-duty vehicle rebates is inclusive of vehicle classes up to and including 2b and indexed to increase with inflation.
- d) Create a stakeholder advisory group to provide feedback and oversight on all EV rebate programs (i.e. both light-duty and buses) Stakeholder advisory group should meet at a minimum twice per year.

The OAG-RUD recommended that if the Commission approved EV rebates, it should limit the rebates for electric buses to \$10 million.

2. Xcel Reply

Xcel agreed to the \$30 million total rebates proposed by both the Department and CEGs. The Company recommended that the approval not include annual budget caps and that the Commission provide flexibility within the electric bus rebate total budget regarding whether the rebates are granted to transit or school buses.

Xcel also stated:

Rather than wait for federal funding to be finalized, before determining how utility spending should be allocated, we believe that the CEGs have it right: Utility funding can serve immediate needs and future federal funding can be used to supplement additional needs. To be clear, the federal funding, when it arrives, will not be sufficient to address the needed investment to electrify bus fleets.

3. Department Reply

The Department continues to support a budget of \$30 million for electric bus rebates. The Department had originally supported an annual budget cap of \$10 to \$15 million to limit rate shock. However, given that Xcel has agreed to a total budget of \$40 million for EV rebates, the Department concludes that it may be more important to allow for Xcel to issue the rebates as the potential customers can use them.

Although the Department understands Xcel's request that the Commission provide the Company flexibility within the total budget and not require strict adherence to specific budgets for specific types of buses, we are uncomfortable that Metro Transit would use up all the funds before other potential recipients, such as schools, have a chance to act. As a compromise, the Department recommends that Metro Transit be eligible for the incremental financing of 30 transit buses and if funds remain at the end of year 2 of the program (presumably 2023) that Metro Transit would be eligible for those funds as well.

Finally, the Department appreciates Xcel's comments expressing its concern with the Commission waiting for federal funding decisions and that utility funding can serve immediate needs. The Department notes that at this point it is unclear both when the Commission will be able to consider this docket and when more information concerning federal funding will be known. If federal funding decisions are known before this docket is considered, the Commission should invite targeted comments on how funding levels in conjunction with ratepayer dollars can best serve Xcel's customers.

4. Department Recommendations

The Department recommends that the Commission approve an electric bus rebate budget of \$30 million to cover:

- a) The incremental cost (\$810,000) of 30 electric 40-foot transit buses for Metro Transit (\$24.3 million);
- b) \$5.7 million to provide rebates to school districts to cover incremental costs of electric school buses and infrastructure upgrades for charging.
- c) At the end of year 2 of the program, Metro Transit would be eligible for any unused funds specified for non-Metro Transit entities.

E. PUBLIC CHARGING

1. Initial Comments

In its Initial Comments, the Department recommended that the Commission approve Xcel's Public Fast Charging Proposal, with the modification that at the conclusion of its pilot program, Xcel must make a compliance filing that addresses divestment issues and identifies possible divestment.

ChargePoint recommended that the Commission modify the Public Fast Charging Stations proposal to allow site hosts for its stations to choose the charging equipment and network service provider deployed on the customer's property. ChargePoint also recommended that site hosts should have the ability to control pricing at the charging stations.

2. Xcel Reply

In its Reply Comments the Company recommended saving the issue of divestiture as a discussion for a later Transportation Electrification Plan and that the discussion may lead to the conclusion that an expansion of utility-owned public charging stations is in the public interest.

3. Department Reply

The Department agrees with Xcel's recommendation that a future Transportation Electrification Plan (TEP) may be the best venue for discussing this issue. The Department concludes that additional utility ownership may be reasonable. However, the Department believes that it is in the public interest to consider the impacts of the Infrastructure Investment and Jobs Act (IIJA) if available before the Commission makes a decision in this docket since public charging has been identified as a major component.

With the goal of simplicity in mind, the Department agrees with Xcel that the Commission should reject ChargePoint's recommendation that site hosts be allowed to choose the charging equipment. The Department strongly objects to ChargePoint's recommendation that site hosts be given the ability to control pricing at the stations.

4. Department Recommendations

The Department recommends that the Commission approve the Company's Public Fast Charging Proposal as proposed by the Company.

F. XCEL'S FLEET ELECTRIFICATION

1. Initial Comments

The Department recommended that the Company submit testimony in its next rate case to support the project and also address the higher EV fleet vehicle capital costs, lower maintenance costs, and overall net benefits to ratepayers.

ChargePoint and Greenlots supported Xcel's proposal.

2. Xcel Reply Comments

Xcel stated that it would provide a discussion of its fleet electrification project in testimony in its next rate case. Xcel also requested that the Commission make a ruling similar to one it made for other Covid proposals "had the potential to be consistent with the Commission request for proposals for

economic recovery and that the acceleration of the projects alone would not be the sole basis of future recovery disapproval.”¹⁵

3. Department Reply

The Department appreciates the Company’s willingness to discuss this issue in testimony in its next rate case. The Department does not object to the Commission make a similar ruling in this case stating that the proposed acceleration of Xcel’s fleet electrification has the potential to be consistent with the Commission request for proposals for economic recovery and that the acceleration of the projects alone would not be the sole basis of future recovery disapproval.

4. Department Recommendations

The Department recommends that the Commission require Xcel to submit testimony in its next rate case to support the fleet electrification acceleration project also to address the higher EV fleet vehicle capital costs, lower maintenance costs, and overall net benefits to ratepayers.

IV. SUMMARY OF DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission approve:

1. A \$5 million income-come qualified Equity Rebate program for residential customers with the following components:
 - a) A rebate of \$5,500 for new LDEVs and \$3,000 for used LDEVs to be used for either purchasing or leasing the vehicles.
 - b) To determine whether a customer is income qualified, the Department recommends that Xcel use multiple verifiable federal, state and utility eligibility standards, such as:
 - Head Start;
 - The Minnesota Family Investment Program (MFIP);
 - Minnesota’s Temporary Assistance for Needy Families (TANF) program;
 - Low-Income Heating Energy Assistance Program (LIHEAP);
 - Low-Income Weatherization Assistance Program (WAP); and
 - Solar*Rewards Income Eligible.

¹⁵ Order Point 1 of the Commission’s March 12, 2021 ORDER DETERMINING THAT PROPOSALS HAVE THE POTENTIAL TO BE CONSISTENT WITH COVID-19 ECONOMIC RECOVERY in Docket Nos. E,G999/CI-20-492 and E,G002/M-20-716.

2. A \$5 million LDEV rebate program for less-resourced non-residential customers (including nonprofits, non-state governmental entities, and commercial entities like small business).
 - i. Rebates for non-profits and small business of \$2,500 for new LDEVs and \$1,250 for used LDEVs, and
 - ii. Rebates for non-state governmental entities of \$5,500 for new vehicles and \$3,000 for used vehicles.
3. An electric bus rebate budget of \$30 million to cover:
 - a.) The incremental cost (\$810,000) of 30 electric 40-foot transit buses for Metro Transit;
 - b.) \$5.7 million to provide rebates to school districts to cover incremental costs of electric school buses and infrastructure upgrades for charging.
 - c.) At the end of year 2 of the program, Metro Transit would be eligible for any unused funds specified for non-Metro Transit entities.
4. Allow Xcel to incorporate an expense level in its upcoming five-year rate plan rate case and using a tracker account. The tracker account would allow the Company and Commission to track the Company's actual rebate expenses and revenues recovered in rates via the rate case. Unrecovered balances would earn the Company's updated short-term cost of debt. Additionally, any over recovery of costs would also earn the Company's short-term cost of debt. In its next rate case, Xcel should propose representative expenses for the EV rebates and administrative costs as well as an annual tracker and a true-up mechanism.
5. The Public Fast Charging Proposal as proposed by the Company.
6. Require Xcel to submit testimony in its next rate case to support its fleet electrification acceleration proposal and address the higher EV fleet vehicle capital costs, lower maintenance costs, and overall net benefits to ratepayers.

In addition, the Department recommends that the Commission require Xcel to submit a filing providing more detail and explanation for why \$0.5-1 million would be reasonable to support community outreach and customer income-verification which could also support outreach to small businesses, nonprofits, and government entities if rebate eligibility is not restricted to only residential customers.

Finally, the Department recommends that the Commission request additional input from parties if the fate of the Infrastructure Investment and Jobs Act or other federal legislation is known before the Commission makes a decision on this docket.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Reply Comments**

Docket No. E002/M-20-745

Dated this 20th day of September 2021

/s/Sharon Ferguson

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