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July 8, 2019

Mr. Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 7th Place East
St. Paul, MN 55101-2147

**Re: In the Matter of Minnesota Power's Petition for Approval of its Electric Vehicle Commercial Charging Rate Pilot
Docket No. E-015/M-19-337**

Dear Mr. Wolf:

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) submits this letter in response to the Commission’s May 22, 2019 *Notice of Comment Period* on Minnesota Power’s proposal for a commercial electric-vehicle (EV) charging pilot.

In its initial Comments, the OAG argued that the pilot’s proposed cap on demand charges would weaken the incentive to charge off peak and increase pilot costs. The Company does not disagree but argues that a cap is needed to “minimiz[e] economic risks to these public charging station owners.” The OAG continues to recommend that the pilot test just one major design feature at a time, and that a demand-charge cap be added only if experience with the pilot shows it to be necessary. If a cap is used, the OAG recommends that it be no lower than 50 percent.

The OAG has also recommended that the pilot’s on-peak period be shortened to better reflect actual charging costs, consistent with the Company’s February 20 report on time-of-day rate designs. The Company claims that the current limitations of its advanced metering infrastructure prevent it from implementing a more targeted on-peak period. But given that the Company already plans to manually program participants’ meters to recognize the pilot’s on- and off-peak periods, it is not clear how setting a shorter on-peak period—or even adding a third, mid-peak period—would be infeasible for the pilot. If the Commission concludes that the pilot’s usage periods should remain as proposed, the OAG would recommend that it solicit comments on what should be done with the Company’s February 20 report.

Finally, the OAG recommended that Minnesota Power identify any reporting requirements from Xcel Energy's commercial EV-charging pilots¹ that it believes are inappropriate for its pilot. The Company did not identify any. The OAG therefore recommends the following reporting requirements for the pilot, adapted from those imposed on Xcel:

1. For fleet EV customers, Minnesota Power must report on:
 - a. Program level
 - i. Participation over time:
 1. number of fleets
 2. number of vehicles
 3. number of ports
 - ii. End-user satisfaction, including surveys of fleet electric vehicle drivers and transit users riding electric buses
 - iii. Publically accessible information on site host characteristics
 - iv. Customer charging behavior in response to rate structure
 - b. Site level, annual
 - i. Location of the fleet charging site
 - ii. Number of ports at the site, and individual port capabilities
 - iii. Costs
 1. Program implementation
 2. Installation costs, including meter programming
 3. Customer service and technical assistance needs
 4. EV Demand Credit
 5. Any other costs not reflected in the list above
 - iv. Revenues, broken down by:
 1. Energy revenues
 2. Demand charge revenues
 3. Fixed cost revenues
 - v. Whether the customer elected to charge with renewable energy
 - c. Site level, monthly
 - i. kWh consumed in the on- and off-peak periods of Minnesota Power's tariff
 - ii. Coincident peak demand, at the MISO system peak and MP system peak, including the time of day at which the peak occurred
 - iii. Non-coincident peak demand, at the MISO system peak and MP system peak, including the time of day the peak occurred

¹ See *In the Matter of the Xcel Energy's Petition for Approval of Electric Vehicle Pilot Programs*, E-002/M-18-643, MINUTES OF APRIL 11, 2019 AGENDA MEETING 4-6 (June 14, 2019) (listing pilot reporting requirements to be included in forthcoming order).

- iv. Number of vehicles, reported by the customer, using the charging infrastructure
- v. Percentage of charging that aligned with any onsite generation, if applicable

2. For public-charging customers, Minnesota Power must report on:

- a. Program level
 - i. Participation over time:
 - 1. number of site hosts
 - 2. number of ports
 - ii. End-user satisfaction
 - iii. Publically accessible information on site host characteristics
 - iv. Customer charging behavior in response to rate structure
- b. Site level, annual
 - i. Location of the site
 - ii. Number of ports at the site, and individual port capacities
 - iii. Costs
 - 1. Program implementation
 - 2. Installation costs, including meter programming
 - 3. Customer service and technical assistance needs
 - 4. EV Demand Credit
 - 5. Any other costs not reflected in the list above
 - iv. Revenues, broken down by:
 - 1. Energy revenues
 - 2. Demand charge revenues
 - 3. Fixed cost revenues
 - v. Whether the site host has elected to charge with renewable energy
 - vi. Rates and fees charged to end user customers, and if those rates changed during the year, what period they were in effect
- c. Site level, monthly
 - i. kWh consumed in the on- and off-peak periods of Minnesota Power's tariff
 - ii. Coincident peak demand, at the MISO system peak and MP system peak, including the time of day at which the peak occurred
 - iii. Non-coincident peak demand, at the MISO system peak and MP system peak, including the time of day the peak occurred
 - iv. Number of charging events, times, and durations, to the extent available
 - v. Percentage of charging that aligned with any onsite generation, if applicable

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If the Commission approves the pilot, it should require Minnesota Power to report the foregoing information annually for each year that the pilot is operating. Doing so will maximize the pilot's value as a tool to inform future permanent EV offerings.

Sincerely,

s/ Peter G. Scholtz

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AFFIDAVIT OF SERVICE

**Re: In the Matter of Minnesota Power’s Petition for Approval of its Electric Vehicle
Commercial Charging Rate Pilot
Docket No. E-015/M-19-337**

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

JUDY SIGAL hereby states that on July 8, 2019, I e-filed with eDockets a *Letter by the Office of the Attorney General—Residential Utilities and Antitrust Division* and served the same upon all parties listed on the attached service list by email, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

s/ Judy Sigal
Judy Sigal

Subscribed and sworn to before me
This 8th day of July, 2019.

s/ Patricia Jotblad
Notary Public

My Commission expires: January 31, 2020.

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