

From: [Sonita van der Leeuw](#)
To: [Staff, CAO \(PUC\)](#)
Cc: [Kathleen Schuler](#); [Ava Corey-Gruenes](#); [joohee](#); [Anne Borgendale](#)
Subject: DOCKET NO. E002/M-25-142: Public Comment Submission by The Coalition for Clean Transportation
Date: Tuesday, January 13, 2026 2:18:09 PM
Attachments: [PDF Coalition for Clean Transportation Xcel Energy's 2025 Transportation Electrification Plan Comments.pdf](#)

You don't often get email from sonita@mn350.org. [Learn why this is important](#)

This message may be from an external email source.

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Good afternoon,

Below are the Coalition for Clean Transportation (CCT)'s comments on the matter of Xcel Energy's 2025 TRANSPORTATION ELECTRIFICATION PLAN DOCKET NO. E002/M-25-142.

Please let me know if you have any trouble accessing the file or need anything else.

Thank you,
Sonita



Sonita van der Leeuw

Senior Clean Transportation Organizer

she/her

[MN350](#) & [MN350Action](#)

sonita@mn350.org

Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

January 13th, 2026

RE: In the Matter of Xcel Energy's 2025 TRANSPORTATION ELECTRIFICATION PLAN
DOCKET NO. E002/M-25-142

Dear Commissioners,

The Coalition for Clean Transportation submits these Initial Comments in response to the Commission's November 13, 2025, Notice of [Comment Period](#) regarding Xcel Energy's Transportation Electrification Plan (TEP).

The Coalition for Clean Transportation brings together multiple organizations to advocate for eliminating Minnesota's transportation-related climate emissions through the increased adoption and availability of sustainable and equitable electrification options. We center our work around environmental justice and ensuring the switch to electrify Minnesota's fleet of vehicles is as equitable as possible.

As a group of advocates working to support schools in electrifying their school bus fleets, we are thankful for Xcel Energy's continued engagement in determining how it can best support school districts, as utilities have a key role to play in supporting school bus electrification. Below, find our recommendations to help ensure Xcel's electric school bus programming meets the needs of school bus participants.

Sufficient Electric School Bus Charging Rebates

We are excited to see that Xcel is willing to help support school districts that have already received electric school buses (ESBs) by providing flat rebates to support the necessary charging infrastructure. In the current proposed plan, Xcel states that they are planning on "covering an estimated 40 percent of eligible project costs for standard rebates and 60 percent of eligible project costs for projects built in EJ communities."¹ Although Xcel mentions in its plan that "a standard rebate will be available to customers installing DCFC for school bus charging, while school bus operators installing bidirectional DCFC will be

¹ Page 55 of [Xcel Energy's 2025 Transportation Electrification Plan](#)

eligible for a comparatively larger rebate, as shown in Table 14²,” there doesn’t appear to be any flat rebate amount identified in this application.

We would like Xcel to share in its reply comments the rebate amount for school bus operators installing bidirectional DCFC charging ports. According to WRI’s [ESB Buyer's Guide](#), depending on the speed of the Level 3 DC Fast Charger, they can cost between \$30,000 (slower) and \$65,000 (faster). This does not include the price for the corresponding electrical infrastructure and construction (i.e., “electric vehicle supply infrastructure”).

We are also concerned that a flat rebate approach for both standard and bi-directional chargers may not allow sufficient flexibility and support for school bus operators seeking to make the switch to electric school buses. Xcel highlights within the docket why it is choosing to offer these rebates: to alleviate the high cost and operational complexity of standard and bidirectional charging for fleet operators. Our concern is that the current rebate amount might not be enough to adequately defray the cost of ESB charging infrastructure for budget-constrained schools, due to the rebates being a flat rate, as opposed to a set percentage of charging infrastructure.

Lower Operating Costs for ESBs

Additionally, we would like to see that these ports are run on a [managed charging program](#) that would benefit both the school bus operator and the utility’s electric grid. With a managed charging program, the school bus operator and districts understand and plan for the best times to charge and access the lowest possible electricity rates. Doing so will help budget-conscious school districts more accurately forecast their operating costs and avoid hefty unexpected electric bills due to demand charges. It would help Xcel by avoiding additional load stress to the grid during peak times. This is particularly important as Xcel states it seeks to provide 60% of project costs within environmental justice (EJ) communities; these communities should especially have access to managed charging programs to avoid adding additional financial burden to their communities.

Progress on the V2G ESB Demonstration Project

Finally, we are concerned about the lack of mention, progress, or update on Xcel’s “vehicle-to-grid” (V2G) demonstration project. We had heard from Xcel in 2024 that there were only going to be two electric school buses included in their pilot program due to a lack of interest from the Department of

² Page 55 of [Xcel Energy’s 2025 Transportation Electrification Plan](#)

Commerce's ESB grant program recipients. However, in the intervening two years, Minnesota school districts and bus operators have been awarded over \$25 million dollars in State³ and Federal funds to support the deployment of electric school buses. These funds have been distributed to over 10 different school districts to get 100 total electric school buses deployed within the Twin Cities Metro and Greater Minnesota. This is evidence that electric school buses are not only working in Minnesota (as they have been since 2017), but also that there is an increased demand for them and understanding of ESB technology, which would support continued engagement on V2G application of electric school buses. We ask Xcel to share more information in its reply comments about the previously-approved V2G Electric School Bus Demonstration project, including whether they sought to engage applications outside the Department of Commerce grant program, and what comes next.

Conclusion

In conclusion, we make the following recommendations and ask:

- (1) Require Xcel Energy identify either a percentage or a flat rebate rate for school bus operators who are applying for bidirectional DCFC charging.
 - (a) Additionally, provide either studies or resources that can demonstrate that the current rebates, as they are (a flat rate opposed to a percentage), will adequately cover between 40 to 60% of the cost of these charging ports as described in Xcel's TEP.
- (2) Require Xcel Energy develop a managed charging program for electric school buses to ensure that school districts are aware of the best times to charge their school buses so as to receive the lowest rates. This is especially needed for school districts and bus operators that provide service within EJ communities.
- (3) Require Xcel Energy include an update on its V2G Electric School Bus Demonstration Project.

We thank you for your time in hearing our perspectives and considering our recommendations.

Sincerely,

Coalition for Clean Transportation member organizations

* * *

³ this includes \$2,617,000 awarded through the [MPCA-administered Volkswagen settlement fund](#), 19 electric school buses through the state-funded and [Dept of Commerce](#)-administered ESB program, and \$17,795,000 in rebates and grants from the U.S. EPA's [Clean School Bus program](#), and \$5,514,766 from the U.S. EPA's [Clean Heavy Duty Vehicle Program](#).

CCT organizes and advocates to eliminate Minnesota’s transportation-related climate emissions through the increased adoption and availability of sustainable and equitable electrification options, centering BIPOC and under-resourced communities who disproportionately bear the impact of climate change, air pollution, and experience high rates of mobility injustice. CCT envisions a future where all Minnesotans, from urban to suburban to rural, have equitable access to clean transportation options that promote health and connection for all.

