



September 20, 2021

Docket No. E002/M-20-745

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

RE: Reply Comments of Greenlots on Xcel Energy's Petition for Approval of Electric Vehicle Programs as part of COVID-19 Pandemic Economic Recovery Investments

Dear Mr. Seuffert,

Greenlots submits these reply comments to the Minnesota Public Utilities Commission ("the Commission") in response to its May 27, 2021 Second Notice of Extended Comment Period in the above-mentioned dockets, inviting comments regarding Xcel Energy's ("Xcel" or "the Company") Petition for Approval of Electric Vehicle Programs as part of COVID-19 Relief and Recovery ("the Petition"), filed on September 15, 2020, and in response to stakeholder comments filed on August 26, 2021, and Xcel's reply comments filed on September 9, 2021.

Greenlots is a leading provider of electric vehicle ("EV") charging software and services committed to accelerating transportation electrification in Minnesota, and a member of the Shell Renewables and Energy Solutions group. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America. Greenlots' smart charging solutions are built around an open standards-based focus on future flexibility while helping site hosts, fleets, utilities, and grid operators manage dynamic electric vehicle charging loads and respond to local and system conditions.

As expressed in our initial comments, Greenlots is encouraged by and supports Xcel's efforts to develop these proposals and believes that utilities can have a significant impact in the recovery of the economy, through both relief for customers who are facing hardship as a result of COVID-19, and stimulating economic development, recovery, and job creation over the coming years through proposals just such as these. Greenlots appreciates the thoughtful reply comments filed by the Company, in addition the initial comments filed by stakeholders.

Below we focus our reply comments on select elements of the Petition.

1. Should the Commission approve, modify, or reject Xcel Energy's proposal to build, own, and operate public fast charging stations?

Greenlots continues to support the Company's proposal to develop a modest critical backbone of twenty-one strategically located public DC fast charging ("DCFC") sites targeting more remote

parts of its service area that are currently not served by the existing fast charging market, and notes the support of other stakeholders.

As the Department of Commerce ("the Department") states, "[g]iven that the state can still benefit from additional DCFC charging and currently there still is not much competition from other providers of public charging, the Department believes that it is reasonable for the Commission to approve Xcel's ownership of Public DCFCs."¹ The Department describes how this investment meets the Office of the Attorney General's three-step "analytical tool" to assist in the evaluation of utility proposals to build EV charging infrastructure.² The Department also discusses how Xcel's proposed DCFC sites/locations are reasonable,³ and how Xcel's proposed rate structure is reasonable and will achieve the goal of helping to ensure that "EV charging occurs off-peak as much as possible" as it "is the most important step in ensuring that increased transportation electrification is in the public interest."⁴ Greenlots agrees.

Greenlots also agrees with the Department's recommendation to grant Xcel's requested waiver of service policy provision,⁵ and the Department's recommendation to grant Xcel's request to defer the operations and maintenance (O&M) costs related to the program marketing, outreach, and customer engagement via its existing EV Tracker Account.⁶

*In response to the Department's recommendation that Xcel be required to make a compliance filing that addresses divestment issues and identifies possible divestment strategies,*⁷ Greenlots is comfortable with Xcel's response that "although there is a specific budget and number of fast charging stations associated with the Company's current proposal, we do not view this as a program with a definitive end point, and it may be more appropriate to consider expansion rather than divestment in the relatively near future"⁸ and that this "...may be an issue that is best left as a discussion point at some time in the future in our TEP filings."⁹

Greenlots also notes that in order to allow for future optionality related to this concept, the Commission and Xcel would likely need to ensure that all equipment and services procured have hardware and software switching capability through conformance to the Open Charge Point Protocol (OCPP). Without this, or if using chargers running proprietary protocols, there is no guarantee another asset owner would even have the physical ability to operate the stations in the future. Regardless of whether this concept of possible future divestment is pursued or not,

¹ Department initial comments at p. 32.

² I.d. at p. 31-32.

³ I.d. at p. 33.

⁴ I.d. at p. 34.

⁵ I.d.

⁶ I.d. at p. 35.

⁷ I.d. at p. 32, 35.

⁸ Xcel reply comments at p. 15.

⁹ I.d.

and as discussed in our initial comments alongside other interoperability considerations,¹⁰ Greenlots encourages this procurement requirement to protect against stranded assets and provide for hardware and software switching capability.

In response to ChargePoint, which conditions its support of the Company's filing on a redesign of the program in ChargePoint's image and preferred business model, focused around its ability to interact directly with site hosts, and site hosts being at the center of charging infrastructure-related decision-making,¹¹ Greenlots supports and agrees with Xcel's response.¹² While site hosts certainly are an important part of the EV charging ecosystem, they represent just one (key) part of it, and there are many other important considerations when designing pilots and programs that will most effectively grow the market. Principal among these considerations are driver needs, as they are the ones actually making the critical decision of whether to drive electric, or not. Except in some fleet situations, site hosts usually aren't the party that is electrifying their vehicle(s). This is critically important to recognize, as supporting driver decisions to electrify, and ensuring their experience is positive once driving electric, is one of the most important consideration when designing programs to support and accelerate transportation electrification. Prioritizing perceived site host interests over known driver interests and the greater public interest would likely not be a prudent use of public funds.

Accordingly, in Greenlots' view whether or not Xcel chooses to include its selected sites in such decision-making is Xcel's prerogative, as the Company would be the infrastructure owner responsible for the equipment, its upkeep, and the driver charging experience, not the site hosting the equipment. Putting such sites in control of this decision-making would result in a serious misalignment of responsibilities and critical gaps in accountability not aligned with the prudent stewardship of ratepayer investments or maximizing the benefit and charging experience of drivers.

Greenlots reminds stakeholders and the Commission that the Company is proposing less than two dozen DC fast chargers. From the standpoint of practicalities and cost containment, the significantly more complicated and complex program design desired by ChargePoint involving multiple network operators being offered and selected by site hosts would be inefficient and impractical, and result in a more fractured EV charging ecosystem for drivers in the Company's service territory. The experience of many utilities in EV charging pilots is that the time, cost and complexity to separately integrate with each EV charging provider's specific network offering is one of the more challenging aspects of such programs.¹³ Xcel should not be forced to re-learn

¹⁰ At p. 5-6.

¹¹ ChargePoint initial comments at p. 4-6.

¹² Xcel reply comments at p. 13-14.

¹³ For example, this was an identified challenge and cost in Xcel Energy's "Petition for Approval of An Electric Vehicle Home Services Program" filed in Docket No. E002/M-19-559, and Xcel notes this very real issue in its reply comments at p. 14.

this same costly lesson that it has already learned, and has been learned by other utilities in other jurisdictions.

ChargePoint's recommendations are not cost effective, in alignment with procurement best practices, or ultimately even supportive of true customer choice. Instead, to actually provide for this, utilities require procurement flexibility and choice, and the ability to set procurement requirements and make procurement decisions that are cognizant of these realities, and can best serve EV drivers. This is especially true with smaller, foundational programs where the charging experience can have a significant impact on EV adoption.

2. Should the Commission approve, modify, or reject Xcel Energy's request to accelerate its own fleet electrification?

Greenlots remains strongly supportive of Xcel's proposal to accelerate the planned electrification of its fleet, accelerating this from a ten-year plan to a two-year plan, and importantly leading by example in transportation electrification. These efforts to purchase 40 light-duty EVs for business purposes along with associated charging infrastructure will not only deliver lower emissions and improve the Company's impact on the environment in its service area, but it will also lower maintenance and fuel costs, as EVs tend to have lower overall cost of ownership compared to internal combustion engine vehicles, delivering additional value to Xcel's ratepayers and the general public.

Greenlots notes that no stakeholders opposed this proposal in their initial comments. While acknowledging that Xcel in its reply comments agreed with the Department to include a discussion of its fleet electrification project in testimony submitted as a part of its next electric general rate case,¹⁴ Greenlots continues to support this proposal while also encouraging the Company to further explore additional ways it can electrify its fleet, including its medium and heavy duty fleet. To support this, Greenlots encourages the Commission to grant Xcel its requested ruling that the acceleration of such projects alone will not be the sole basis of future cost recovery disapproval, as the Commission has done with other investments proposed in Xcel's initial COVID-19 Economic Recovery proposal.¹⁵

Conclusion

Greenlots appreciates consideration of these comments, and we look forward to continued engagement in efforts supporting transportation electrification in Minnesota.

Respectfully submitted,

¹⁴ Xcel reply comments at p. 15.

¹⁵ Order Point 1 in the 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.

Docket No. E002/M-20-745

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COVID-19 Pandemic Economic Recovery Investments

September 20, 2021

Page 5

A handwritten signature in black ink, appearing to read 'Erick Karlen', with a long horizontal stroke extending to the right.

Erick Karlen

Sr. Advisor, Policy & Market Development