December 17, 2025

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

Re: Docket No. 25-142, Xcel Energy's Transportation Electrification 2025 Plan

Dear Minnesota Public Utilities Commission,

Thank you for the opportunity to comment on Xcel Energy's (Xcel) Transportation Electrification 2025 Plan. As Xcel winds down the Streetside Charging Opportunities Pilot, It's Electric, Inc. (It's Electric) encourages the Minnesota Public Utilities Commission (PUC)'s continued prioritization of equitable, public electric vehicle (EV) charging access, including curbside chargers in the right-of-way. It's Electric's curbside chargers address key implementation and operational challenges while offering scalable, elegant access.

It's Electric is an EV charging station owner-operator, purpose-built for cities, with a mission to unlock access to clean vehicles for all urban drivers. Millions of drivers lack home or private garages and cannot transition to electric vehicles due to the lack of on-street charging. It's Electric accelerates the adoption of EVs with its scalable and simple curbside charging solution, ensuring that every community has access to clean, sustainable transportation options – all at no cost to our city partners.

As the Minnesota PUC and Xcel write program requirements, we offer recommendations to allow for more flexibility and private sector investment in curbside charging:

- **To maximize private sector investment and deployment flexibility, remove requirements mandating multi-port pedestals and contiguous siting for curbside charging spaces.**
- **To future-proof the program, allow for the use of J3400 (NACS) charging ports (including Case B detachable cable chargers), as the new industry standard supersedes SAE J1772.**

Port Minimums: The minimum port requirements in many federal EV charging programs present a challenge for curbside charging, which typically has one standalone curbside pedestal or pole. These federal programs largely considered corridor and destination charging when developing program guidance, and if Xcel and the MInnesota PUC want to encourage more streetside/curbside charging through an expansion of the Commercial EV Infrastructure Rebate and Advisory Program, jurisdictions should have the discretion to identify groups of chargers for purposes of a "charging station" and should not have a mandatory port minimum, so each jurisdiction can be responsive to local needs and geography.

J3400 & Detachable Cables: It's Electric is the first to offer a detachable cable (also known as "socket-outlet") charger in the United States. This hardware is commonplace in Europe, where it is the predominant way cities have built out their urban EV charging network. As cities look to build out their curbside networks stateside, they are increasingly looking for detachable cable options.

In addition to keeping the charger footprint small – crucial in a right-of-way deployment context – this configuration is also more beneficial in three key ways: improving reliability, accounting for accessibility (we provide free cables), and future-proofing EV charging infrastructure. Market studies cite lack of access to charging as a primary reason why people aren't making the switch to EVs[1], and in an urban context that means everyday (not road trip) access. While chargers along the highway need to have attached cables (especially DC Fast chargers), L2 chargers deployed curbside in neighborhoods will serve the same drivers on a daily/weekly basis. For these drivers, the biggest threat to being able to use this infrastructure is not the one-time process of acquiring a cable; it's the frustration of the charger being unavailable because the cord has been vandalized or damaged.

Reliability. Problems with attached cables are the most common reason a charger is broken/unavailable. When the cable breaks on chargers with an integrated cable, often the entire unit must be replaced, a costly and time-consuming process. This represents a major barrier to meeting "uptime" requirements. Reliability is a key issue for consumers as they weigh whether to make the switch to EVs. This is particularly true for drivers in disadvantaged or low-income communities, who most often do not have access to off-street parking and thus rely on public charging. For residents living in these communities who want to purchase an EV but can't charge at home, reliable public charging infrastructure is an equity issue. With a detachable cable, if a particular cable breaks, the solution is much cheaper and easier–replacing that user's cable – and any delay does not impact the rest of the community.

Accessibility. When a socket-outlet charger is not in use, the sidewalk and street are kept clear of cable. This is an important safety and accessibility feature, as dangling cable can be a hazard to those with mobility and vision impairments. The user-detachable cable model has been key to our ability to adhere to the U.S. Access Board's latest Design Recommendations for Accessible Electric Vehicle Charging Stations – which state that "Charging cables cannot block or obstruct accessible routes when stored or when connected to vehicles"[2] – while keeping the charger footprint small.

Future-proofing. A charging post with a J1772-compatible "universal" J3068 socket-outlet can be used to charge any vehicle with a driver-provided cord, whether the EV has a J1772 or J3400

[1] *See* J.D. Power, *Despite Improvements in Reliability and Availability, Public Charging Remains a Top Concern*, J.D. Power (May 24, 2023), https://www.jdpower.com/business/resources/despite-improvements-reliability-and-availability-public-charging-remains-top.

[2] *See* U.S. Access Bd., *Accessibility Guidelines for Electric Vehicle Charging Stations*, https://www.access-board.gov/tad/ev/ (last visited July 8, 2025).

charging inlet. This effectively future-proofs the investment as we build a network of publicly-available Level-2 chargers, ensuring that the charging infrastructure can be used for the hardware's expected useful life of 10 years rather than growing obsolete beforehand.

Future-proofing EVSE infrastructure is a critical equity issue. Disadvantaged communities already lag behind in terms of EV adoption, with the high upfront cost of the vehicle itself and the lack of public EV charging infrastructure cited as the primary reasons.[3] The Inflation Reduction Act of 2022 created both new and used EV tax credits to help address affordability barriers; while the new EV tax credit continued an existing incentive, the used EV tax credit was a first-time acknowledgement that more than 70% of Americans purchase used rather than new cars. With the EV tax credits now expired, maintaining equitable access to EVs for all income levels is more urgent than ever.[4] As EVs move along the technology adoption curve to include lower-income EV buyers, these buyers will be disproportionately likely to not have access to at-home charging because they live in multi-family homes or are renters.

Key Advantages to It's Electric's Chargers

Scalable, Efficient Installation: We harness spare electrical capacity from nearby buildings to deploy low-footprint curbside Level-2 EV chargers. This building connection between our chargers and properties' electrical panels avoids the barrier of grid limitations and the costly, time-consuming process of creating a new utility interconnection. We run a shallow conduit from the building's panel to the curb, powering a charger. This innovation enables us to share revenue with every property owner that hosts (at zero cost to them) an It's Electric charger. We are the only EV owner/operator in the U.S. to offer this model, establishing passive income streams for community institutions while making it easier for everyone in their neighborhood to drive electric.

Connecting EVs to the grid is an enduring problem for grid modernization. In dense cities, the utility upgrades required for EV chargers paired with the need for space are prohibitive to deploying charging stations. We connect to the grid through buildings instead of requiring a new connection. The building connection saves on months of time from engineering and permitting, and allows for complete flexibility where charging infrastructure can be located. Because of this, we can rapidly scale by utilizing existing electrical supply in the adjacent private property.

Owner/Operator: As a private owner/operator, we assume the full cost of hardware, installation, maintenance, electricity upgrades, customer support, insurance, liability, vandalism repairs, and ongoing operations. We also assume any financial risk that chargers will not be adequately utilized. Our investment model requires no upfront expenditure from the city or utility, while

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[3] J.D. Power, *EV Divide Grows in U.S. as More New-Vehicle Shoppers Dig in Their Heels on Internal Combustion*, https://www.jdpower.com/business/resources/ev-divide-grows-us-more-new-vehicle-shoppers-dig-their-heels-internal-combustion (May 1, 2023) (last visited Apr. 2, 2024).

[4] Mathilde Carlier, *New and Used Light Vehicle Sales in the United States from 2010 to 2022*, https://www.statista.com/statistics/183713/value-of-us-passenger-cas-sales-and-leases-since-1990/ (Aug. 29, 2023) (last visited Apr. 3, 2024).

offering a permanent public benefit. Each charger we install represents thousands of dollars in private capital injected into local infrastructure. These are shovel-ready projects aligned with the city's transportation and climate objectives, delivered without draining municipal budgets. Indeed, we even share revenue with host properties, generating income for members of the community.

Submetering: We support the Minnesota PUC exploring a demonstration of submetering as a means to enable EV-only pricing signals. We also strongly support the adoption of EVSE submetering with an authorized agent for commercial customers as well, modeled after the California program. This approach will accelerate transportation electrification by expanding access to electrification while lowering costs for customers and utilities alike.

As the Minnesota PUC, Xcel Energy, and the Twin Cities create a pathway for vendors to deploy more permanently, we support pivoting the streetside charging pilot to a categorially eligible recipient to the Commercial EV Infrastructure Rebate and Advisory Program. **As the PUC and Xcel develop program requirements for the Commercial EV Infrastructure Rebate and Advisory Program, we recommend specifically considering community charging. We strongly suggest flexible program requirements, such as no port minimums, allowing for SAE J3400 ports, and detachable cable solutions.** By implementing innovative curbside charging such as It's Electric's curbside chargers, Minnesota can implement a practical, flexible, and cost-effective network that ensures reliable EV access for all residents.

Thank you for your consideration.

Sincerely,

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