414 Nicollet Mall
Minneapolis, MN 55401

September 9, 2021

—Via Electronic Filing—

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

RE: REPLY COMMENTS
ELECTRIC VEHICLE PROGRAMS AS PART OF COVID-19 RELIEF & RECOVERY
DOCKET NO. E002/M-20-745

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments to the Minnesota Public Utilities Commission's FOURTH NOTICE OF EXTENDED COMMENT PERIOD issued August 3, 2021 in the above-referenced docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at Holly.R.Hinman@xcelenergy.com or Martha Hoschmiller at Martha.E.Hoschmiller@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

HOLLY HINMAN
REGULATORY MANAGER

Enclosures

c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie J. Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S PETITION FOR APPROVAL OF ELECTRIC VEHICLE PROGRAMS AS PART OF ITS COVID-19 PANDEMIC ECONOMIC RECOVERY INVESTMENTS

E002/M-20-745

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) these Reply Comments in accordance with the Commission's FOURTH NOTICE OF EXTENDED COMMENT PERIOD issued August 3, 2021 in the above-referenced docket.

We appreciate the thoughtful analysis provided by parties and present this Reply to address their various comments. There is broad alignment among stakeholders in the need to accelerate transportation electrification and to do so in a way that efficiently integrates electricity consumption from electric vehicle (EV) charging to maximize the use of existing grid resources and renewable energy. As the transportation sector has become the leading source of carbon emissions in the state and the country, it is critical that we take aggressive steps now to encourage EV adoption. That is why, when the Commission issued a Notice on May 20, 2020, in Docket No. E,G-999/CI-20-492, seeking information regarding investments that utilities could make that were consistent with existing Commission orders and that would, among other things, provide significant utility system benefits, reduce carbon emissions across various sectors of the economy, and assist in economic recovery for Minnesotans, we responded with a variety of EV proposals.

Specifically, with respect to the investments relevant to these Reply Comments, we proposed to invest $150 million in vehicle rebates, targeted at mass transit, school buses and lower-cost light-duty vehicles (LDVs), $5 million in public charging stations located in portions of our service territory we believe private developers are unlikely to target on fast timelines to help increase widespread EV adoption, and over $2 million in accelerating the electrification of our own vehicle fleet. Each of these proposals aligns with the Commission's directive in its February 1, 2019 Order in Docket No. E-999/CI-17-879 that "investor owned utilities should take steps to encourage the cost-effective adoption and integration of EVs."

Unlike states such as Colorado, which has both income-tax credits for individuals who purchase EVs and recently-approved utility-funded rebates for low-income customers, Minnesota does not have any direct incentives for individuals to purchase EVs.[1] And although the economics of EVs are improving compared to internal-combustion engine (ICE) vehicles, sales of EVs in the state continue to lag behind ICE vehicles, and electric bus prices remain high for transit agencies and school bus operators. The Company estimates that annual EV sales in its service area will only comprise about four percent of total vehicle sales this year, up from about three percent in 2020. On a cumulative basis, EVs still represent less than one percent of all LDVs on the road. For heavy-duty vehicles, the incremental costs of electric alternatives are significant, with Metro Transit citing in this docket more than an $800,000 difference between electric and diesel buses, inclusive of required charging equipment costs. Incremental costs for electric options are also significant for school buses. Our proposed investment in EV rebates is designed to address these issues and encourage both the purchase of EVs by those who otherwise would not and the integration of EV-charging load as a grid asset using time-varying rates and other managed charging programs as a condition for receiving a rebate.

In contrast as to how the Office of the Attorney General (OAG) and the Minnesota Department of Commerce (Department) characterize the net benefits produced by the Company's proposed rebates, as estimated by Energy+Environmental Economics (E3), as being lower than the base case of doing nothing, the Company points out that the net benefits between its proposal and the base case are nearly identical for electric customers and for the State of Minnesota (i.e., roughly a one percent difference or a seven percent difference, respectively). Furthermore, E3's analysis uses a conservative approach, meaning that neither should the forecasted levels of transportation electrification in E3's net benefits analysis be treated as a given, nor should the net benefits from the Company's proposals be assumed to be limited at the levels described in E3's report in this docket. Rather, benefits could reasonably be even higher, as discussed in these comments. Moreover, there are other potential benefits stemming from the proposed LDV, transit, and school bus rebates that are less easily quantified. These benefits include increased equity in the access to the benefits of transportation electrification, the potential for even higher incremental electric vehicle adoption, and increased economic activity and job creation from stronger demand for

[1] Colorado has a state tax credit of $2,500 for light-duty passenger vehicles purchased between 2021-2022, which declines to $2,000 in 2023, and higher amounts available for larger vehicles.

clean transportation options.

At a high level, most commenters generally supported our proposed investment in EV rebates. Commenters raised concerns, however, with the size of the proposed investments, eligibility and program design, cost-recovery approach, and reporting requirements. We address these points below, and discuss federal funding, market dynamics, and the potential for future expansion of the investments.

Commenters, similarly, supported our proposed investments in Public Fast Charging Stations, but raised a handful of questions regarding charging equipment and network service choice, charging pricing, and future "divestment" plans. We address each of these points below. Finally, while there were limited comments addressing our Acceleration of Xcel Energy Fleet Electrification proposal, we provide a limited reply to address the Department's request that we include a discussion of the proposal in our upcoming electric general rate case.

REPLY COMMENTS

I. EV PURCHASE REBATES

Several parties issued comments about our EV Purchase Rebate program, with most of those comments expressing support for the rebate program to be approved in some form. Several parties recommend that the Commission approve a smaller-scope rebate program. As discussed below, we do not object to a smaller initial rebate program. Parties also objected to our proposal for cost recovery of rebates and to treat rebates as regulatory assets. Below, we discuss why the utility financing the costs of rebates and recovering those costs over time is in the best interests of our customers. Finally, we discuss eligibility and other program design details as well as federal funding, market dynamics, and the potential for future expansion.

A. Rebate Program Size

In contrast to the Company's proposal to make significant investments in EV rebates – $50 million for lower-cost LDVs and $100 million to support electric bus purchases by transit agencies and school bus operators – commenters recommended smaller programs, with both the Department and Clean Energy Groups (CEGs) recommending approval of a $5 million LDV rebate program for residential customers and $30 million bus rebate program, with the CEGs recommending a further $5 million investment in LDV rebate for less-resourced non-residential customers, and the OAG recommending a $5 million residential LDV rebate and $10 million bus rebate.[2] While we continue to believe that the state and our customers would benefit most from our originally proposed investment in rebates in order to significantly accelerate EV adoption in Minnesota, we believe any investment is better for our customers and communities than none.[3] If other parties and the Commission believe that a smaller investment in rebates is more appropriate at this time, we do not object to that change in scope.

Specifically, the Company is not opposed to the CEGs' proposal for $5 million for residential LDVs, $5 million for non-residential LDVs, and $30 million for bus rebates (consisting of approximately $20 million for Metro Transit, $5 million for other transit providers, and $5 million for school buses).[4] We support the CEGs' suggestion that it would be appropriate for the Company to return with an expanded proposal should these initial rebates prove successful. To make these investments most beneficial for our customers, however, it is critical that the Commission order an appropriate cost-recovery mechanism for the rebate investments, as discussed below.

Both the Department and CEGs have requested that eligibility for the LDV rebates be limited to low-income residential customers. The CEGs also advocate that a portion of rebates be set aside for non-residential nonprofits, non-state governmental entities, and small businesses. While the Company believes a rebate program with broader eligibility would spur the broadest adoption of EVs and therefore be in the public interest, we do not oppose starting with a narrower focus on income-qualified and less-resourced customers.

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[2] The Department and CEGs cite the scale and eligibility criteria of a similar program proposed by the Company's affiliate, Public Service Company of Colorado (Public Service), as the basis for their proposed revised program scope. We note, however, that EV adoption in our Minnesota service territory is in a materially different place than adoption levels present in Colorado. Colorado has had a state vehicle purchase tax credit for several years, which has directly contributed to materially higher EV adoption levels in Colorado as compared to Minnesota. Especially in the absence of a state vehicle purchase tax credit, EV adoption in Minnesota is likely to materially lag behind adoption levels in other states. Further, the approved rebates are part of Public Service's comprehensive $110 million transportation electrification plan package.

[3] As we noted in our 2021 TEP filing, filed on June 1, 2021 in Docket No. E999/M-17-879, there are only about 14,000 LDV in our service territory. Though adoption of the Clean Cars Rule, which is scheduled to go into effect in January 2024, is likely to have a positive impact on vehicle availability, this policy is only one lever of many that are needed to increase EV adoption in the state. Increasing the availability of EVs for purchase is just one of the necessary market accelerants required to advance Minnesota transportation electrification. As reflected in E3's assumption of a 12-year life for vehicles, these are purchases not made frequently, and other support is needed to accelerate the anticipated rate of turnover from ICE vehicles to EVs.

[4] The Company stresses that, as described by the CEGs on Pages 19 and 20 of their comments, the scope of transit and school bus rebate program approved by the Commission will directly impact the number of electric buses adopted in its service territory due to the significant up front cost barrier associated with electric buses. Without support such as the proposed rebate program, customers are not likely to adopt electric buses while the upfront cost differential compared to alternatives remains high.

We do, however, urge the Commission to remain open to considering whether the level of rebates authorized now will support the market transformation that the Company and the State of Minnesota are seeking by 2030. The Company strongly believes that early action to support the EV market is critical to achieving the state's 2030 transportation electrification goal of having 20 percent of LDVs be electric.[5] To this end, the Company believes that while supporting a smaller scale program is an appropriate option at this time if the Commission so elects, we believe it would also be appropriate to consider future modifications and expansions of the vehicle purchase rebate program in our next biennial (Transmission Electrification Plan) TEP filing on June 1, 2023.

B. Rebate Cost Recovery

As a preliminary matter, we address several arguments made by the OAG that the Commission does not have authority to allow the Company to recover investments in rates because such investments are not in "electric service." This argument is too limited in its understanding of Commission authority. Under Minn. Stat. § 216B.03, the Commission's primary responsibility with respect to electric rates is to determine that all rates are "just and reasonable." As the cost-benefit analysis filed by the Company in this docket shows, the electrification of transportation fostered by our proposed rebates has benefits for all customers, all program participants, and all of Minnesota. These results are driven by how EVs today can become grid and environmental assets, particularly with the Company's proposed requirement that rebate recipients participate in time-of-use rates or future managed charging programs. That is consistent with the Commissions' findings in its February 1, 2019 Order in Docket No. E-999/CI-17-879, "electrification of Minnesota's transportation sector can further the public interest[,]" particularly if it improves "utility system utilization/efficiency and plac[es] downward pressure on utility rates[,]" increases "electricity demand during hours when renewable energy is most prevalent on the system[,]" and reduces "statewide greenhouse gas and other environmentally harmful emissions."[6]

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[5] The Company estimates that new LDV purchases will likely need to be more than 75 percent electric by 2030 in order to reach a 20 percent LDV goal.

[6] Relatedly, the OAG argues that because the Company said, in response to a discovery request, that we did not believe a tariff change was required for the rebate program, the rebates were not related to ratemaking. This misses the point that the EV adoption spurred by rebates should have a beneficial impact on customer rates. The Company provides many rebates to customers through our Conservation Improvement Program (CIP), which are beneficial to all customers' rates without requiring tariff changes. Similarly, here, if the Commission agrees that the EV adoption caused by the Company's proposed investments in rebates is in the public interest and will result in just and reasonable rates, it is within its authority to approve them.

Second, the OAG argues that the Commission should not approve the Company's proposal to treat the rebates as capital assets because they are not investments in physical plant. Contrary to the OAG's implications, however, there is no requirement that capital assets and liabilities in utilities' rate base be limited to physical plant. The Commission has historically approved rates for the Company that include numerous non-plant assets and liabilities, such as accrued deferred income taxes and the Prairie Island Extended Power Uprate asset. Should the Commission agree with the Company that it is best for customers to include the proposed rebates in rate base and amortize them over several years, there is nothing restricting its ability to do so.

Putting aside the OAG's incorrect arguments about the Commission's authority, the Department and OAG both argue that the Commission should not approve the Company's request to treat our proposed investment in rebates as a capital asset; instead contending the rebates should be treated as current-year expenses. We, respectfully, disagree. Recording the Company's investment in rebates to a regulatory asset both allows the Company to maximize the benefit of rebates by incentivizing near-term purchases and avoids potential rate shock that could come from expensing the rebate costs as they are incurred. In addition, by building up the costs and then amortizing them over several years, the Company is better able to match the costs of the rebates with the benefits to all customers that will be received through the life of the EVs purchased with the assistance of rebates. This helps preserve generational equity, as future customers will reap grid efficiency benefits and environmental benefits from having more EVs on the road in the near-term.

As an alternative to its argument that the Commission does not have authority to allow utilities to offer vehicle rebates at all, the OAG argues that, if the Company is to offer vehicle rebates, it should simply expense the rebates over several years. While this would theoretically spread out the potential rate shock that comes from expensing all the proposed rebates in a single year, the result of this proposal would limit the potential for the rebates to accelerate EV adoption, because the rebate payments to customers would need to be spread over several years.[7] As a result, rather than providing the rebates as early as possible to maximize benefits and then spread the costs over time, the OAG's proposal would spread both the rebates and their costs over many years, which would effectively limit the positive impact of the rebates and maximize the impact on customer rates in a given year. This would materially limit the EV adoption potential of the proposal, and thereby the benefits to all customers. It also would upend the Commission's request for "possible investments" that utilities can make to benefit the public, turning this into a proposal that is directly funded by customers through rates each year.

[7] Rebate issuances would need to match expenses in rates due to the basic principle of utility accounting that costs treated as operating and maintenance expenses should be recorded in the year that they occur.

Like the OAG, the Department recommends the Company expense the cost of rebates over a five-year rate plan in our upcoming rate case. However, the Department further advocates for tracking unrecovered rebate expenses in a tracker account that would accrue interest expense on unrecovered expenses, acknowledging that there is a cost to the Company investing funds in rebates and attempting to mitigate the limitations on the program proposed by the OAG. The Department's approach, however, is still insufficient because it would not afford the Company the opportunity to recover the full costs of financing the rebates.

The rebate program will span several years, and as with other investments the Company makes, we would finance an investment in rebates using a variety of funding sources, including short and long-term debt and equity. 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.

We note that similar arguments were raised by Colorado Public Utilities Commission Staff and the Office of Consumer Counsel in connection with the Company's affiliate, Public Service Company of Colorado's (Public Service) TEP and proposal for LDV rebates.[9] There, certain environmental organizations supported the Company's proposal to treat investments in rebates as a capital cost because such an approach "aligns costs with benefits" and fosters "robust investment now, when action to accelerate the EV market is most critical, allowing EV benefits to multiply over the period of cost recovery."[10] Furthermore, Public Service discussed the potential drawbacks of not having similar regulatory treatment across customer-facing EV programs (i.e., programs featuring support through rebates rather than through infrastructure). Such a situation could create disincentives for the utility to design and direct limited resources toward particular programs. In contrast, treating rebates as capital can let customer and market needs dictate the optimal design of EV programs and put all EV programs on a level playing field.

The Colorado Public Utilities Commission agreed:

> We agree with Public Service that increasing transportation

[8] The Programmatic Replacement and Maximum Allowable Operating Pressure project recovered through our Gas Utility Infrastructure Cost Rider is an example of this.
[9] *See* Public Utilities Commission of Colorado Decision No. C21-0017, *Commission Decision Granting Application with Modifications*, Jan. 11, 2021, Proceeding No. 20A-0204E.
[10] *Id.* at 24.

> electrification through rebates is especially critical in the early market transformation years. We conclude that allowing Public Service to amortize TEP rebates will, in turn, incent the Company to invest in TEP programs that use rebates. Moreover, we find amortization of rebates creates a more balanced incentive structure for TEP programs involving utility-owned assets and TEP programs only involving rebates.[11]

The same is true here, and the Commission should approve the Company's request to capitalize and amortize its investments in rebates over ten years.

In their Comments, the Department asked that we provide a rate impact analysis of the various cost recovery methods for rebates that have been discussed so far. To put the potential impacts of the proposed rebate programs in context, Table 1 below provides the estimated monthly bill impact to the average residential customer from several other customer programs.

Table 1
Monthly Bill Impacts

	2022 Budget	Monthly Bill Impact[12]
Rebates Program as Filed	$79,000,000	$1.82
Reply Comments Rebates Scope	$32,646,077	$0.75
DSM Programs	$128,485,463	$2.95
Community Solar Gardens	$189,478,021	$4.36

In addition to assessing the monthly bill impacts when compared to other programs, we also assessed the revenue requirement resulting from capitalizing the rebates, as the Company proposed, and expensing the rebates as proposed by the OAG. Table 2 below compares the net present value (NPV) of each revenue requirement, along with the annual revenue requirement for the first three years of the program. We note that this analysis was completed based on the lowered rebate amounts discussed earlier in our Reply and includes the rebate amounts for LDVs and buses, along with costs related to program administration.

[11] *Id.* at 26.
[12] Monthly impact based on a residential customer using 650 kWh

Table 2
Revenue Requirement Comparison

Recovery Method	NPV – Total Revenue Requirement[13]	2022 Revenue Requirement	2023 Revenue Requirement	2024 Revenue Requirement
Capitalization	$38,270,400	$2,748,906	$5,832,666	$6,251,762
Expense	$37,965,842	$30,693,943	$4,668,163	$2,603,735

As this analysis shows, the NPV of revenue requirements is nearly identical (less than a 1 percent difference) regardless of what cost recovery method is chosen. However, by capitalizing the rebates and amortizing the costs of the rebates over ten years, we can provide rebates immediately, when they will be most beneficial to all customers while avoiding a large rate impact for customers in the very first year of the program.

The benefits of the rebates – particularly when provided as early as possible – are augmented by the issuance of the proposed rebates being contingent on participation in either time-of-use rates or a future managed charging program, such as the Company's proposal for an EV Optimization program in the Load Flexibility Pilot Program proposal.[14] Time-of-use rates and managed charging will encourage off-peak charging, and in the future may allow the Company to work with customers to charge at times that are beneficial to the grid, which will help us minimize distribution system upgrade costs that may be necessary if new EV customers simply charged at times that were most convenient to them.

C. Eligibility and Other Program Design Details

Regarding the amount of rebate available per vehicle, for residential LDVs, both CEGs and the Department supported higher per-vehicle rebate amounts than the Company's initial proposal contemplated. The Company supports the level of per-vehicle rebate outlined by the Department for LDV of $5,500 per new EV and $3,000 per used EV. As noted by the Department, these rebate amounts are consistent with those authorized for Public Service's Colorado program. If the Commission approves additional LDV rebate funding for non-residential customers, the Company believes that an appropriate level for small business and nonprofits would be $2,500 for new EVs and $1,250 for used EVs, as initially proposed, and that the Commission could consider supporting LDV rebates for public entities at the same level as income-qualified residential customers.

[13] In 2021 Dollars
[14] Docket No. E002/M-21-101

For transit and school bus rebate amounts, CEGs and the Department suggested funding for only incremental costs above ICE alternatives. For school bus rebates, the amount of rebate per bus proposed by the Company is designed to cover only incremental costs above non-electric school bus alternatives, inclusive of some of the charging equipment and wiring costs needed to support electric school buses. For transit rebates, the Company is comfortable with the approach of providing rebates only for incremental cost. That said, we want to ensure the administrative process associated with implementing the program is efficient and not unnecessarily complicated with a case-by-case analysis of incremental costs. Consistent with information cited by the Department, the Company supports a cap for an initial rebate program at $800,000 per transit bus, and consistent with our original proposal a cap of $275,000 per school bus, available in both instances to fund both bus and charging equipment and not to exceed 75 percent of actual costs incurred. The Company is comfortable with this cap for the life of the proposed program, which is now anticipated to last from 2022-2025.

For all aspects of the vehicle purchase rebate program, the Company believes it is important to maintain some flexibility in administering the program, at a minimum by not imposing annual budget caps for the rebate programs. The Company agrees with Tesla's comments on not setting an annual program funding cap. Annual budget caps would only serve to frustrate customer demand for the rebate programs. Additionally, the Company requests flexibility within the total budget for bus rebates to ensure we can maximize the deployment of funding for buses for the duration of the program without requiring strict adherence to specific budgets for specific types of buses (e.g., transit v. school buses) as long as the overall program budget constraint is met.

CEGs support additional funding for several new program aspects not contemplated in the Company's filing. If the LDV rebate program is focused on income-qualified residential customers, the Company agrees that additional funding would be needed to support outreach and the use of a third party to conduct income-verification work. For Public Service's income-qualified rebate programs in Colorado, we are working with third parties to support both community outreach activities and income verification. The Company estimates a budget of at least $0.5 – 1 million would be appropriate over a three-year period 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.

CEGs also propose a rebate program for residential charging infrastructure, as well as a program to provide financial support for the use of charging infrastructure for customers that do not have charging equipment at home. The Company appreciates these suggestions; however, these additional ideas need further evaluation before they could be pursued, and there is not sufficient information in the record to support including these program elements at this time. The Company can take these suggestions under consideration for possible incorporation into future EV program proposals. We note that in our 2021 TEP filing,[15] we indicated we were exploring approaches for helping to reduce home wiring upfront costs. A future program designed to address these costs could provide the financial support CEGs are seeking to support residential charging infrastructure.

Finally, as proposed by the Company, eligibility for LDV rebates is contingent on participation in a time-of-use rate tariff or a future managed charging program, which we believe is a key component to supporting the societal and ratepayer benefits, by encouraging peak avoidance to keep system costs down. We believe that the CEGs proposal to exempt certain customers from this requirement may add complexity to the program, which will add costs to administering the program and hamstring the efforts to reduce on-peak charging. We believe it is important to keep as many customers on time-of-use rates or managed charging as possible. However, 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.

D. Stakeholder Process and Reporting Requirements

The CEGs recommended a robust stakeholder engagement process for the rebate program and an advisory group that would meet on at least a semi-annual basis. We understand and appreciate the need to engage interested parties to ensure that a new rebate program is running smoothly. We believe that the Commission's established reporting regimen, through EV Annual Reports and TEPs and their associated comment periods can meet this need and provide the appropriate avenue for the Company to provide needed information to keep interested parties informed and begin discussions if issues arise. We also note that we currently have a regular schedule of stakeholder sessions used to discuss our EV program portfolio, which can serve as an additional venue to discuss the rebate program and other programs that arise from this docket.

The Company would also like to confirm that we are generally comfortable with the slate of reporting requirements recommended by the CEGs. We note, however, that CEG's suggestion to report on the methods of charging available to and used by rebate recipients will be challenging to report on using readily available data and will

[15] Docket No. E999/M-17-879

require customer survey work to provide. We also appreciate the efforts the Commission and staff are undertaking currently to streamline EV reporting requirements. To that end, we ask that regular reporting for our rebate program be included in EV Annual Reports.

E. Federal Funding and Market Dynamics

An important consideration for the bus rebate program discussed by the CEGs is how the rebate program can provide an urgent source of funding for transit agencies ahead of future federal funding. Additionally, even when the federal funding arrives, it will not bridge the entire gap needed to help achieve the state's electric transportation goal. As the CEGs note in their comments, Metro Transit's development of an electric fleet will likely be slowed without this source of funding from rebates.[16] The Company understands this to be the case based on discussions with Metro Transit. While it seems likely that federal funding may become available to transit agencies in the future under the Infrastructure Investment and Jobs Act currently under consideration by Congress, it is uncertain when this funding may be available and unlikely that it would be available to fund electric bus purchases as quickly as the Company is prepared to implement its rebate program. This uncertainty makes planning by Metro Transit difficult. 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.

This dynamic is also present in consideration of the proposed LDV purchase rebates. While additional federal tax incentives are currently being contemplated for new EV purchases, these tax credits are uncertain, may fail to address the upfront cost challenge at the point of purchase or lease, and may not be refundable credits that would allow households with lower incomes to receive the benefit. In contrast to tax credits, the Company's proposal for point-of-sale purchase rebates, wherever possible, ensures equal access for customers who need the most support to transition to an EV.

It is vital to remember that the increasing EV adoption in the Company's base forecasts should not be assumed to be a given outcome. Uncertainties exist with any forecast, and EV adoption in the future is no different. Vehicle adoption will depend on the combination of myriad factors involving the number of EV models available, upfront and ongoing cost differences between EVs and ICE vehicles, supportive policy and regulatory environments to enable higher adoption, macroeconomic

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[16] *See* Page 20 of the CEGs August 27, 2021 comments.

conditions that affect industry supply and consumer demand, and many other variables. While the Company provided LDV and heavy-duty vehicle adoption forecasts which serve as foundational inputs into the E3 study filed in this docket, the Company's proposed electric vehicle rebates can serve as an enabling feature to help ensure that EV adoption continues to grow. E3 conservatively assumes in the study that LDV rebates only impact adoption levels during the time they are offered. However, it is reasonable to assume that, by having more EVs on the road in Minnesota, more consumer experience and awareness about EVs, and enhanced dealership experience on selling and servicing EVs, the market penetration for EVs beyond the rebate period could be even larger. E3 also very conservatively assumes that, due to the uncertainties involved, the transit bus rebates do not produce any changes in adoption levels compared to the base case. Again, it likely that reducing the upfront cost barriers to electric alternatives would yield higher adoption levels – even if those impacts are difficult to quantify.

II. PUBLIC FAST CHARGING STATIONS

Parties discussing our Public Fast Charging Stations expressed strong support for our Public Fast Charging Station proposal, noting that both Company ratepayers and the entire state will benefit from additional fast public chargers. In our Reply, we discuss two aspects of the modifications recommended by ChargePoint: charging equipment and network service choice and charging pricing. In addition, we also discuss the Department's recommendation for future divestment discussions for charging station ownership.

A. Charging Equipment and Network Service Choice

ChargePoint has recommended that the Commission modify our Public Fast Charging Stations proposal to allow site hosts for our stations to choose the charging equipment and network service provider that is deployed on their property.

Due to the limited nature of the relationship, we do not expect the site hosts to have any strong preferences in charging equipment. However, we are open to allowing those site hosts that do have a preference to choose from the options that are selected as a part of the request for proposal (RFP) process we will complete during our preparation to launch our fast-charging station network.[17] Our RFP will identify two fast charging equipment options, at a minimum, that will be available. At this time, the vendor and equipment selection process has not been completed, so we are unsure what the capacity of these chargers will be. It is possible that there will be

[17] The Company notes this RFP process is currently underway to select charging equipment options to support all of Xcel Energy's EV programs across multiple jurisdictions.

options that have capacities that are less than 150 kW, but we cannot guarantee that a 50 kW fast charger will be one of the final choices as ChargePoint has requested.

We do not, however, support ChargePoint's recommendation that site hosts be given a choice of network service providers. The Company believes that integrating more than one network service provider into our internal billing, accounting, and IT systems does not make sense for the small number of stations that are involved with this proposal. Supporting multiple service providers will add administrative complexity, and material costs, to the program that we do not believe are necessary at this time. The Company will be the owner and operator of these stations, not the site hosts. The Company will be the customer paying the retail electric bill at each charger location and will in turn be receiving all revenues from operation of the stations. As such, it makes sense to allow the Company to have control of this part of the program.

B. Charging Pricing

We also believe that ChargePoint's proposal to allow site hosts the ability to control pricing at the stations is not warranted for this specific proposal. As with the question of network service provider choice, the fact that the Company will be the owner and operator of the stations warrants giving the Company, with oversight from the Commission, control of charging pricing. Allowing the Company to be in charge of pricing will ensure that the stations have a more standardized price and will lead to a more networked experience for drivers and a better customer experience. It will also ensure that the Commission has complete transparency into pricing decisions, as the Company will keep the Commission regularly informed of pricing through our annual reporting processes and would request Commission approval of pricing changes if needed, consistent with our other tariffed prices.

Also, having the Company in charge of pricing will ensure that the rates will have some form of price signals to encourage less on-peak charging so that EVs provide as many net benefits as possible to the grid – a central goal of our proposal. As noted by the Department, providing drivers incentives to charge during off-peak periods is important to delivering transportation electrification in a way that is in the public interest.[18]

C. Future Divestment Discussions

The Department requested that the Company be required to make a compliance filing to discuss issues and potential strategies related to the divestment of the public fast

[18] See Page 34 of the Department's comments

charging stations. The Company is comfortable with discussing these issues at some point in the future, noting that any discussion and analysis of the issue may conclude that it is in the public interest for the Company maintain ownership and operation of the sites. That said, 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. As a result, the Company believes that, while divestment may at some point be appropriate to consider, it is premature to do so now. This may be an issue that is best left as a discussion point at some time in the future in our TEP filings.

D. Number of Available Public Fast Charging Stations

In response to the Department's request for this information, the Company believes that the number of public fast charging stations stayed roughly the same in the last year.[19] We currently estimate that there are approximately 48 accessible fast charging stations in our service territory, along with 10 Tesla charging stations.

III. ACCELERATION OF XCEL ENERGY FLEET ELECTRIFICATION

The Department, ChargePoint, and Greenlots all discussed our acceleration of Xcel Energy fleet electrification, with ChargePoint and Greenlots expressing support for the proposal. While the Department did not express support or opposition to our proposal, they did ask for us to discuss the proposal further in a future rate case.

As the Department recommended, we will be including a discussion of our Xcel Energy fleet electrification project in testimony submitted as a part of our next electric general rate case. We request that the Commission consider our fleet electrification proposal in a similar vein as other investments proposed in our initial COVID-19 Economic Recovery proposal.[20] In connection with a number of proposed investments, the Commission ruled that the 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.[21] In other words, while not guaranteeing approval in a rate case, the Commission said it would not disallow recovery of the investments solely because of

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[19] Based on data as of April 2021, the most recent data the Company has. This the data used for our 2021 TEP filing.

[20] Investments related to transmission, natural gas, and accelerated removal of retired assets

[21] See 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

the acceleration of the investments. We request that the Commission make a similar ruling about our fleet electrification program in this docket.

CONCLUSION

We appreciate the opportunity to provide this Reply. For the foregoing reasons, and as discussed in our prior filings in this Docket, we respectfully request the Commission approve our EV purchase rebates proposal and our public fast charging stations program as modified by these Comments. We will discuss the acceleration of Xcel Energy fleet electrification in our upcoming electric general rate case. We ask that the Commission rule in this docket that they will not disallow recovery of fleet electrification investments solely because the project has been accelerated.

Dated: September 9, 2021

Northern States Power Company

Certificate of Service

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket Nos. E002/M-20-745

Dated this 9th day of September 2021

/s/

____

Lynnette Sweet
Regulatory Administrator

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