



January 13, 2026

*Via Electronic Filing*

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

**Re: In the Matter of Xcel Energy’s 2025 Integrated Distribution Plan**

**Docket E002/M-25-142**

Dear Mr. Seuffert,

The Alliance for Transportation Electrification (“ATE”) submits these comments in response to Xcel Energy’s (“Xcel’s”) Transportation Electrification Plan, filed November 1, 2025 in the above-referenced docket.

### **Introduction**

ATE is a 501(c)(6) non-profit corporation established in early 2018 with the goal of promoting policies and regulatory measures to accelerate the pace of EV adoption and infrastructure. We take a “big tent” approach to advance the industry and focus not just on accelerating EV charging deployments—which necessarily requires a strong utility role—but also promoting public accessibility and open standards. We are presently involved in about 30 proceedings in the States before the PSCs, state energy offices, Legislatures, Governors, state DOTs and DEPs, and other agencies. We follow transportation electrification (TE) plans in a variety of states, including Washington, Oregon, Virginia, Michigan, Colorado, and Minnesota.

## **A Streamlined, Customer-Focused Portfolio**

ATE appreciates Xcel's efforts to streamline its TE portfolio, focusing on the highest-impact programs that are most tailored to the needs of the customers and communities that the utility serves. In ATE's experience, a small number of utility TE programs, managed effectively, deliver more efficient benefits than a broader number of hyper-specific programs that may lack the administrative resources to be successful.

We particularly note Xcel's emphasis on lowering customer barriers to program enrollment and moves toward program designs with simpler terms and conditions or that will be a better fit for the EV charging market that has evolved over the past several years.

## **Commercial Programs**

Xcel proposes to sunset existing, tailored EV service infrastructure ("EVSI") programs for fleet, public charging and multi-dwelling unit ("MDU") sites, in favor of a single, flexible commercial EV charging program that focuses on assignable rebates with higher rebates in environmental justice ("EJ") areas. A similar shift toward rebate programs is reflected in TE Plans and utility program filings across the country. Rebate programs—while they may still cover both EV service equipment ("EVSE") and EVSI—are less costly for utilities to administer, simpler for customers to participate in, and can flexibly accommodate the evolving charging market, with new business models such as Charging-as-a-Service ("CaaS"). Within its proposed commercial rebate program, we note that Xcel has maintained important distinctions for certain customer classes (e.g., EVSE rebates for MDUs and public charging and advisory services for fleets), geographies (e.g., higher rebates for EJ areas), and charging types (e.g., different rebates for standard and bidirectional school bus EVSE).

## **Residential Managed Charging Programs**

ATE views managed charging—whether passive (as in a TOU rate) or active (as in control via EVSE software or vehicle telematics)—as an essential component of a modern utility TE portfolio. These programs and pilots, while nascent, represent an important opportunity for utilities to capture the grid benefits of EVs, namely their flexibility with respect to when and how fast they charge. We appreciate Xcel's historic leadership among utilities in managed charging and its evolving approach as the market introduces new technologies and approaches to enroll customers.

While we support the near-term use of TOU rates and passive managed charging programs to drive EV charging to off-peak times, we acknowledge that in the long term, these approaches can result in secondary peaks on the system. Xcel's proposed active Charging

Perks managed charging program for residential customers builds on the lessons learned from the passive Optimize Your Charge program, and anticipates the declining value of the latter program as residential time-of-use (“TOU”) rates phase in during 2026. The proposed Charging Perks program reflects best practices among leading utilities, as they modify their managed charging approaches toward active, distribution-optimized program designs. While these programs may not pass traditional cost-benefit analyses (CBA) in their initial deployments, we believe that launching such programs remains important for utilities to continue building their information technology infrastructure and operational practices as these programs move from pilot stage to greater scale. In addition, it is critical that utilities engage actively with residential customers in these programs and be able to assess the changing behaviors and load profiles so they can plan accurately for the future grid.

### **Hardware and Software Interoperability**

ATE continues to encourage the use of qualified product lists—such as EPRI’s Vetted Product List<sup>1</sup>—which allow utilities to exercise some measure of quality control for the hardware and software that are deployed within its programs. In addition, we strongly recommend that all residential and non-residential EVSE on these lists be compliant with Open Charge Point Protocol (“OCPP”).<sup>2</sup> This important protocol allows different hardware and software to communicate with each other, meaning customers can change software providers while maintaining the same hardware (for example, Xcel switching from Shell Recharge to EVConnect for networking services for utility-owned public DCFC). This provides an important element of customer choice with respect to charge management services, and a crucial element of reliability so that hardware can remain operable even if a software vendor exits the market. Given that the EV charging market has seen multiple such exits just in the past year,<sup>3</sup> sometimes to the detriment of driver and customer experience,<sup>4</sup> we continue to emphasize the importance of compliance with the latest version of OCPP standard, along with contractually-defined migration plan options so that capital investments in EVSE hardware do not become stranded.

### **Conclusion**

Minnesota has long been a leader in supporting utility transportation electrification (“TE”) programs, with Xcel supporting customers’ adoption of EVs since before 2019. As Xcel

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<sup>1</sup> Electric Power Research Institute. [Vetted Product List](#).

<sup>2</sup> OCPP is an evolving standard that is managed by the Open Charge Alliance, based in the Netherlands. OCPP 2.0.1 ed3 was approved as an International Electrotechnical Commission (IEC) standard (IEC63584) in 2024. <https://openchargealliance.org/protocols/open-charge-point-protocol/>

<sup>3</sup> Electrek. [Shell Recharge exits the US EV charger software market](#). December 2024.

<sup>4</sup> Canary Media. [Enel X Way abandoned its US EV charging customers. What happens next?](#). October 2024.

notes in its TE Plan, ATE continues to observe that adoption of EVs can help maximize use of the existing grid, contributing to electric rate affordability for all customers.<sup>5</sup> Especially at a time when federal leadership on TE is lacking, we believe that strong state leadership can continue to facilitate widespread electrification and bring benefits to state residents.

Overall, ATE continues its support for Xcel's EV programs in Minnesota, which comprise a thoughtful portfolio of activity to support EV adoption across customer segments. We find that Xcel has clearly articulated the need for the program changes they propose in their 2025 TE Plan, and has supported these proposals with customer research and lessons learned from past program implementations and best practices in leading states like Colorado. We encourage the Commission to approve Xcel's TE Plan in a timely way.

Sincerely,



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Executive Director



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<sup>5</sup> Alliance for Transportation Electrification. *Making Electricity More Affordable with EVs*. July 2025. [https://ate-ev.org/wp-content/uploads/2025/07/ATE\\_Making-Electricity-More-Affordable-with-EVs\\_FINAL.pdf](https://ate-ev.org/wp-content/uploads/2025/07/ATE_Making-Electricity-More-Affordable-with-EVs_FINAL.pdf)