

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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January 13, 2025

**RE: In the Matter of Xcel Energy’s 2025 Transportation Electrification Plan
Docket No. E002 /M-25-142**

**Initial Comments of Fresh Energy, Union of Concerned Scientists, Sierra Club, the
Environmental Law and Policy Center, and Plug In America**

Fresh Energy, Union of Concerned Scientists, Sierra Club, the Environmental Law and Policy Center, and Plug In America (collectively the Clean Energy Groups, or CEGs) submit these Initial Comments in response to the Commission’s November 13, 2025 Notice of Comment Period,¹ focusing on Topics 1-6, Xcel Energy’s Transportation Electrification Plan (TEP) initially filed on October 31, 2025.² We appreciate the opportunity to participate in this docket and look forward to working with the Commission, Xcel, and other stakeholders to improve the proposal to further support transportation electrification efforts in Xcel’s Minnesota service territory.

The CEGs recommend the Commission **approve** the proposed TEP with the recommended modifications described below as well as requirements for subsequent filings and amendments to fill gaps in transportation electrification to generate equitable outcomes and ensure that the proposed spending creates downward pressure on rates. These recommendations include, but are not limited to:

- Direct Xcel Energy to expand its plan for transportation electrification to bring its budget for transportation electrification (through either the TEP or Energy Conservation and Optimization (ECO) to align with the State of Minnesota’s decarbonization targets,³ and to align with per-customer utility spending levels in Colorado, Illinois, and other states leading the charge in this area.

¹ Docket No. E002/M-25-142. [Notice of Comment Period](#) (November 13, 2025) Topics 1-6

² Docket No. E002/M-25-142. [Xcel’s Transportation Electrification Plan](#) (October 31, 2025)

³ See [Minnesota Greenhouse Gas Emissions Goals](#), which includes reducing emissions by 50% by 2030 compared to 2005 levels.

- The Commission to require additional program design and implementation research in parallel to operation of the proposed *Charging Perks* program described in Section IV below to ensure that the program will facilitate learnings to enable the larger benefits of future Vehicle Grid Integration (VGI).
- The Commission to reiterate its order for the implementation of the approved Electric School Bus (ESB) Vehicle-to-Grid (V2G) Demonstration Project.⁴
- The Commission to direct Xcel to revise its proposed off-peak energy charges for Xcel's Time of Use (TOU) energy rates for residential electric vehicle (EV) programs to reflect a lower interim increase, and the Commission to direct Xcel develop an expansion of the EV Accelerate at Home (EVAAH) Program to accommodate Level 1 charging.
- The Commission to require development of an EV specific rate for public charging which reduces the negative impact of demand charges beyond the current General Service Rate and the now closed A90 rate.⁵
- The Commission to require Xcel to develop new pilots and innovations, filed as either supplemental filings to the TEP or in future TEPs, as described in Section VI below.

The CEGs appreciate that Xcel's existing and planned transportation electrification programming is summarized within this docket, including planned filings to be made through the ECO process. Although ECO Modifications will be filed separately and approved by the Department of Commerce (DOC), the Clean Energy Groups wish to comment upon these programs for the benefit of the Commission and make the following recommendations to Xcel and the DOC to improve these proposals:

- Improve the Commercial EV Infrastructure Rebate program by expanding eligibility for the proposed higher rebate tiers, the development of a rebate tier for Level 1 Electric Vehicle Supply Equipment (EVSE) installations, and the expansion of eligibility for EVSE rebates proposed for electric school bus chargers to include electric transit buses as described in Section II within these comments.
- Improve the Residential Advisory Services and Guided Charging Installation program by developing outreach strategies that work better for underserved groups, working with community organizations and stakeholders to go beyond the scope of traditional marketing practices.
- Propose EV and E-Bike rebates for both residential and commercial customers under the ECO program either as a modification to the existing 2024-2026 or within the next

⁴ Docket No. E002/M-23-452 [Order Approving Xcel's Transportation Electrification Plan with Modifications](#), (May 9, 2024). Page 2.

⁵ Docket No. E002/M-25-142. [Xcel's Transportation Electrification Plan](#) (October 31, 2025). Page 36.

Triennial process to align with existing or proposed programs by other Minnesota Investor-Owned-Utilities (IOUs).⁶

In below sections, the CEGs will outline the need for robust utility support for transportation electrification, further explain our positions and recommendations for improving the proposed programs and comment on other topics, as outlined in the Notice of Comment Period.⁷

I. Introduction:

Electric Vehicles are now a proven technology with proven benefits for consumers, the electric grid, public health, and the climate.⁸ The Clean Energy Groups have long advocated for prudent yet ambitious utility programs and investments to enable access to electric transportation options for more consumers, particularly people that have not been able to access them due to where they live or the upfront cost of installing the necessary infrastructure to charge at home.

Despite these efforts, Xcel's Minnesota transportation electrification investments now lag behind other major utilities operated by Xcel Energy and major utilities in other midwestern states. On an annualized per customer basis, many peer utilities spend significantly more than Xcel (Northern States Power, or NSP) on transportation programming in Minnesota, including Public Service Company of Colorado (PSCo) and Southwest Public Service (SPS), both also owned by Xcel. These companies have an approved annual transportation electrification budget over ten times higher per customer than NSP has spent on average over the last four years in Minnesota. The proposed TEP moves to increase spending somewhat, but it will remain well below levels approved in even more modest TEPs, such as the \$125 million budget for DTE approved by the Michigan Public Service Commission in early 2025, as well as approved transportation spending by ComEd and Ameren in Illinois.

⁶ OTP's EV Rebates were [approved by the Department of Commerce](#) under Docket No. E017/CIP-23-94 on December 1, 2023. [Minnesota Power proposed EV and E-Bike rebates](#) as an ECO Modification under Docket No. E015/CIP-23-93 in October 2025, currently pending approval from the Department of Commerce.

⁷ Docket No. E002/M-25-142. [Notice of Comment Period](#) (November 13, 2025) Topics 1-6

⁸ A more complete summary of the benefits of EVs is available in Appendix B. These benefits are also well documented in previous CEGs filings such as [Initial Comments on Minnesota Power's TEP Supplemental Filing](#) under Docket No. E002/M-23-452 filed in March 2025, as well as our [Initial Comments on Xcel's 2023 TEP](#) under Docket No. E002/M-23-452 filed in December 2023 for additional information.

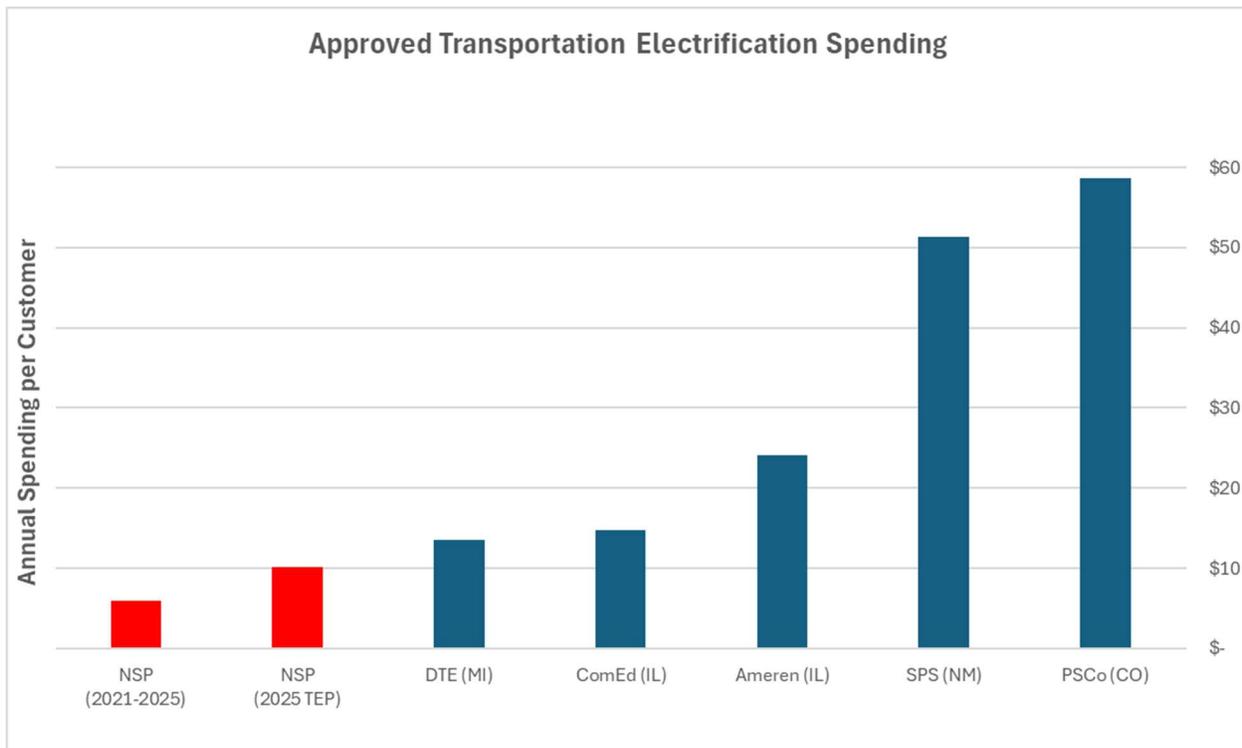


Figure 1: Proposed Spending in this TEP (Including proposed ECO spending) lags behind peer utility transportation electrification spending. Calculations and sources available in Appendix A.

Not only are Xcel’s investments out of sync with those being made by similar utilities in the central United States, but they are also out of sync with Minnesota’s state climate goals. Xcel remarks in its filing that “The State of Minnesota has set a goal of having one in five vehicles in the state electrified by 2030 while the Company has committed to enabling the charging infrastructure necessary to energize approximately one in five vehicles across its service territory by 2035”.⁹ This admitted disconnect between the state and the Company’s ambitions should not be ignored by the Commission and should instead serve as a foundation for expanding existing programming, requiring the development of additional programming, and expanding proposed programming in this TEP to make sure the charging infrastructure necessary to meet our state’s climate goals is built.

Now is not the time to pull back on the transition to EVs. Transportation remains the largest source of climate emissions in our state, and EVs continue to become cleaner as fossil fuels are replaced by renewable electricity sources.¹⁰ EVs are also projected to become more affordable and accessible to lower income drivers in coming years, particularly as more used electric

⁹ Docket No. E002/M-25-142. [Xcel’s Transportation Electrification Plan](#) (October 31, 2025). Page 34.

¹⁰ Information on emissions by sector in Minnesota is available through the [MPCA](#). Information regarding the grid emissions and associated emissions from EV charging is available through [the Union of Concerned Scientists](#).

vehicles are offered for sale off leases and as automakers shift towards manufacturing more affordable EV models.¹¹

The transition to EVs has enormous potential to provide downward pressure on electric rates for all customers by passively shifting charging towards off-peak hours and by actively managing the charging of many electric vehicles. Indeed, an October 2025 study from the Public Advocates Office of the California Public Utilities Commission notes that “increased infrastructure costs due to electrification is offset by increased electricity consumption,” which produces downward pressure on rates driven by electric vehicles and building electrification.¹² EVs in particular present a unique opportunity for utilities to expand electricity sales in excess of needed additional infrastructure investment if charging can be shifted primarily to overnight hours where electricity demand for other uses is low. However, to enable the EV adoption that can lead to these benefits in Minnesota, we need to stimulate investment in our public charging infrastructure and provide customers the assurance that driving an electric vehicle will benefit them regardless of where they live. Somewhat counterintuitively, the main benefits of this public charging infrastructure is all the at-home grid-optimizing overnight charging that it will create from increased EV adoption.

Xcel’s proposed TEP is a step in the right direction towards realizing a future where widespread electric vehicle adoption delivers its promised benefits, but the plan doesn’t go far enough to align with our state’s climate targets or to direct investments into underserved communities. In the next sections, the CEGs will comment on the newly proposed programs within Xcel’s TEP and offer suggestions on how these programs can be expanded and improved to better facilitate equitable access to electric transportation for Minnesotans.

II. EV Commercial Infrastructure Rebate Program Comments and Recommendations

Importance of Utility Support for Charging Infrastructure

Minnesota has made significant progress on developing public charging infrastructure since Xcel’s last TEP, but significant gaps remain. Although the number of public charging ports has doubled since 2022,¹³ a September 2025 report released by automotive research firm SBD Technologies ranks Minnesota 48th out of 51 U.S. States (and the District of Columbia) on an index of important EV infrastructure adoption factors, such as public chargers per EV and average charger power.¹⁴ As EV adoption continues to rise, the need to improve this public

¹¹ See Q4 2025 reporting from [Marketplace](#), [Forbes](#), and [NPR](#)

¹² See [report](#) from Public Advocates Office of the California PUC published October 2025.

¹³ See data from the [EValue MN](#) tool from Atlas Public Policy

¹⁴ [Here-SBD EV Index Report](#) available for download.

charging infrastructure becomes increasingly important. Furthermore, existing infrastructure gaps slow EV adoption by both car owners and commercial fleet operators, entrenching systems of fossil fuel dependence and pushing the many benefits of vehicle electrification further into the future. With this in mind, **the CEGs strongly support Xcel’s plan to incentivize the equitable and ambitious build-out of charging infrastructure to support both fleets and residential customers living in multifamily housing.**

Equity Considerations

The CEGs submitted comments to the 2023 TEP requesting that Xcel provide a more robust discussion of equity within its TEP programming.¹⁵ These requests were ultimately required by Commission order, and Xcel has subsequently provided valuable insight into the equity impacts of its transportation electrification programming in Quarterly and Annual Reports as well as in this proposed Commercial Infrastructure Rebate Program.¹⁶ The CEGs appreciate these efforts and request that Xcel strengthen them further by expanding eligibility for enhanced rebate tiers, expanding support for the EV Spot Network which significantly benefits underserved populations,¹⁷ and providing further support for transit electrification.

The CEGs appreciate Xcel simplifying the process of receiving utility assistance by moving from utility-owned infrastructure programs towards flat rebate amounts with simple qualification processes. Xcel’s proposal is to offer two tiers of rebates, one for standard commercial customer installations and one for commercial customer installations in ‘Environmental Justice Areas’ which are defined by the Minnesota Pollution Control Agency as any census tracts where at least one of the following four criteria are met:

- (1) at least 40% of the population is people of color, or;
- (2) at least 35 percent of households have income at or below 200 percent of the federal poverty level, or;
- (3) in which at least 40 percent of the population has limited proficiency in English, or;
- (4) is located within Indian Country, which is defined as federally recognized reservations and other Indigenous lands.¹⁸

The CEGs believe that these eligibility criteria will direct needed investment into historically underserved areas and help bolster the adoption of electric transportation options in those areas, however, we note that there are some potential gaps where there are historically underserved or overburdened Xcel customers that may not be automatically eligible for the higher rebate tier

¹⁵ [Initial Comments of Clean Energy Groups on Xcel’s 2023 TEP](#), Docket No. E002/M-23-452 (December 20, 2023). Page 23.

¹⁶ [Commission Order accepting Xcel’s 2023 Transportation Electrification Plan](#), Docket No. E-002/M-23-452 (May 9, 2024). Page 15.

¹⁷ Docket No. E002/M-25-142. [Xcel’s Transportation Electrification Plan](#) (October 31, 2025). Page 43.

¹⁸ Map and list of qualification for EJ Area Designation is available through [MPCA](#)

using only the MPCA Environmental Justice Areas definition. Those potential gaps include customers in Xcel’s rural service territory, Xcel customers particularly impacted by traffic-induced air pollution, and Xcel customers residing in affordable multifamily complexes located within moderate to higher income geographies. **The CEGs thus recommend that Xcel offer the following additional eligibility criteria for the EJ rebate tier in its forthcoming ECO proposal:**

- Offer the higher rebate tier for DCFC installations in rural areas of Xcel’s territory (i.e. Census areas designated as rural)¹⁹ located at least 30 miles from the nearest existing DCFC.
- Offer the higher Level 2 charger rebate tier for ‘Income Qualified’ multifamily buildings as defined by the ECO Act.²⁰
- Offer the higher rebate tiers for both DCFC and Level 2 chargers constructed by public entities, such as at transit and the publicly owned EV Spot Network.²¹
- Offer higher rebate tiers for chargers located at businesses owned by women and BIPOC.
- Offer higher rebate tier to projects particularly impacted by air quality, particularly traffic pollution, as identified in ongoing Minnesota Pollution Control Agency Cumulative Impacts Rulemakings.²²

With these additional qualification pathways for enhanced rebates, Xcel will be able to reach more underserved populations than under the currently proposed framework. The suggested additional rebate tiers are aimed at improving compliance with the Minnesota Legislative directive for utilities under statute 216B.1615 to “increase access to the use of electricity as a transportation fuel for all customers, including those in low- and moderate-income communities, rural communities, and communities most affected by air emissions from the transportation sector”.

DCFC EVSE and EVSI Rebates

The DCFC rebate amounts proposed in the Commercial Infrastructure Rebate Program should help increase investment in electric vehicle fast charging in Xcel’s service territory. The company has correctly identified that investment in DCFC is substantially lagging behind the need for DCFCs.²³ There is a significant gap between the existing DCFC charging network and

¹⁹ See [U.S. Census definitions](#)

²⁰ Under this definition buildings with five or more units that have at least 66 percent of the units occupied by low-income households qualify as Low Income.

²¹ Expanding rebates for EV Spot Network and for transit electrification outside of EJ Areas will benefit residents of EJ Areas by making it easier for them to access services and professional opportunities outside of their immediate community.

²² The [MPCA Rulemaking](#) process is closely linked to the EJ framework, but certain geographies might not qualify as an EJ area but are disproportionately impacted by traffic pollution and should be eligible for higher rebate amounts.

²³ Docket No. E002/M-25-142. [Xcel’s Transportation Electrification Plan](#) (October 31, 2025). Page 32

the needed network to support the EV transition. The recently completed MnDOT EV Infrastructure Needs Assessment (EVINA) concludes that the state will need over 3,000 new DCFCs to meet the state's needs by 2030, split approximately equally between the Twin Cities Metropolitan Area and Greater Minnesota.²⁴ Xcel's territory spans both urban and rural parts of the state, including portions of vital transportation corridors such as the Interstate 94 Corridor between the Twin Cities and Saint Cloud and the Interstate 35 Corridor south of the metro to Faribault.²⁵ Increasing access to fast charging in these corridors, as well as helping to bolster significant necessary DCFC development in the metro itself,²⁶ is a critical component of widespread and equitable transition to electric transportation.

To address this gap, Xcel has proposed DCFC rebates to spur investment into the construction of new DCFCs in its service territory. The CEGs agree with Xcel's assessment that flat rebate amounts should simplify the process compared to rebates calculated as a percentage of project costs and are supportive of this method. However, the CEGs note that in some areas the rebates proposed in this TEP are less generous than those offered by similar utilities, including in the same Commercial Infrastructure Rebate Program offered by Xcel in New Mexico (SPS) and Colorado (PSCo), and therefore may not sufficiently stimulate the market to catch up with driver needs.

Notably, Xcel's Commercial Infrastructure Rebate Programs in both New Mexico and Colorado differentiate rebate amounts by the power level of the charger,²⁷ with 50kW chargers being eligible for lower EVSE rebates than higher powered 350kW chargers. In Colorado, this effect stacks with equity eligibility. Xcel offers higher rebate amounts for Disproportionately Impacted Communities (DIC), which creates a significant differentiation between a low-powered DCFC in non-DIC areas (eligible only for a \$45,000 EVSI rebate) and a high-powered charger in a DIC (eligible for both a \$90,000 EVSI rebate and a \$40,000 EVSE rebate).

²⁴ See MnDOT's [EVINA Report](#) Pages VI and XI.

²⁵ See [Minnesota Electric Service Area Map](#) from the PUC as well as MnDOT's [EVINA Report](#), Page 28.

²⁶ Compare [EVINA Report](#) DCFC ports required by 2030 on ES-1 on Page XI to existing ports as reported in Table 10 on Page A-37.

²⁷ See Appendix A to these comments

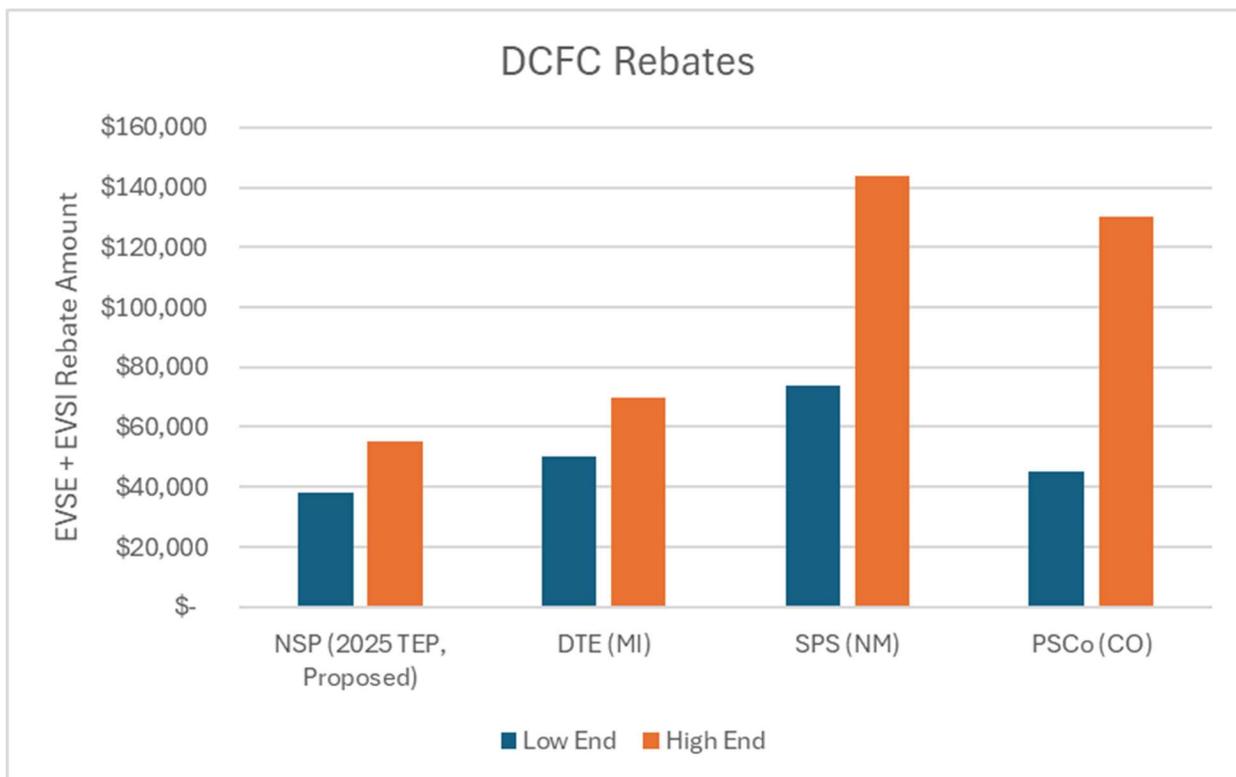


Figure 2: Xcel’s combined EVSE and EVSI rebates for DCFCs proposed in this TEP are comparatively lower than rebates offered by other utilities. Calculations, sources, and other examples are available in Appendix A.

Although the CEGs believe that EVs should be charged using lower powered charging when possible to avoid expensive infrastructure upgrades, scaling rebates based on the charger’s wattage will prevent unintentionally incentivizing underpowered 50kW DCFC installations at sites with lower average dwell-times. These installations have been shown to lead to driver frustration which slows overall EV adoption.²⁸ **In its ECO filing, the CEGs recommend that Xcel propose scaled DCFC rebate tiers based on the kW power of the chargers**, as has been done by PSCo, SPS, ComEd, and Ameren Illinois.²⁹

The CEGs are supportive of aligning rebate levels with those of peer utilities to ensure that Minnesota’s EV supportive infrastructure (and EV adoption) does not fall further behind. Xcel’s proposed rebate amounts are relatively lower than peer utility offerings. Xcel also states that EVSI rebates will be “capped at total eligible project costs as defined in the program terms and conditions”.³⁰ We ask that **Xcel provide these program terms and conditions in Reply Comments** so that stakeholders may better understand which costs will be eligible for EVSI rebates and the rebates efficacy to stimulate investment.

²⁸ See [EVINA Report](#), Page 46.

²⁹ See Appendix A to these comments

³⁰ Docket No. E002/M-25-142. [Xcel’s Transportation Electrification Plan](#) (October 31, 2025). Page 56.

Electric School Buses and Supporting Fleet Electrification

Electric School Buses are important for children’s public health and educational attainment. Studies have shown that diesel emissions from school buses negatively impact respiratory health and academic performance.³¹ In addition to providing benefits to children, electrifying school buses offers an opportunity for improved grid reliability and resilience through bidirectional charging capabilities. For this reason, the CEGs were heartened by Xcel’s 2023 TEP’s planned demonstration project for four V2G-enabled ESBs. At this stage, Xcel’s TEP does not make it clear whether this V2G pilot will continue to move forward or if it is to be completely replaced by the bidirectional charging rebate proposed in this TEP. The CEGs believe the V2G demonstration project offered an important opportunity for Xcel to learn about V2G value and program design, and **we encourage the Commission to require Xcel to continue to implement that program.** Furthermore, since Xcel has not yet begun implementation of this program, the CEGs reiterate recommendations from our 2023 TEP comments that **eligibility for the School Bus V2G Demonstration Project should be extended to school districts benefiting from Minnesota Pollution Control Agency Volkswagen Settlement funds and/or U.S. EPA Clean School Bus and/or U.S. EPA Clean Heavy Duty Vehicle programs or any other source, alongside those funded through the Department of Commerce.**³² The majority of ESBs awarded in Xcel’s service territory come from sources outside of the Minnesota Department of Commerce funds, so expanding the scope to these recipients may improve program uptake.³³

In the proposed Commercial Infrastructure Rebate Program, Xcel offers support for ESBs complementary to the V2G Demonstration Project in the form of charger rebates, with additional EVSE rebates available for bidirectional chargers. These EVSE rebates should be sufficient for many ESB use cases, however, installation costs and EVSI costs for these projects tend to be high. Xcel’s proposed EVSI rebates may be insufficient to account for 40-60% of the costs of these installations. The CEGs may support increases to Xcel’s EVSI rebates, pending further analysis in response to Xcel’s Reply Comments. Furthermore, the CEGs lament that there is no additional EVSE support given to school districts in EJ communities. **We recommend Xcel add additional support for ESB chargers for EJ Communities in its eventual ECO filing.**

The CEGs note that the advisory services portion of the Commercial Infrastructure Rebate Program should aim to help school districts, transit providers, and other fleets electrify their chargers using lower-powered chargers when feasible, including Level 2 chargers. However, higher rebates for higher-powered chargers could be useful in some cases, consistent with our

³¹ Austin, Wes, Gart Heutel, and Daniel Kreisman. 2019. “School Bus Emissions, Student Health and Academic Performance.” *Economics of Education Review*, 70: 109–126.

³² [Initial Comments of Clean Energy Groups on Xcel’s 2023 TEP](#), Docket No. E002/M-23-452 (December 20, 2023). Page 15.

³³ See [Minnesota ESB Mapping Tool](#) from ELPC, last updated December 2025.

recommendation for public DCFC.³⁴ Grid benefits and costs to participants should be further optimized by managing the charging of these vehicles, which should in the near future include an active managed commercial charging program akin to the *Charging Perks* program proposed in this TEP for residential customers.³⁵ Doing so for school buses is particularly beneficial since their predictable schedules and long dwell times lend themselves effectively to managed charging.

Furthermore, the CEGs believe that the benefits of electrifying medium and heavy-duty vehicles should not be restricted just to ESBs. Expanding the Electric School Bus program's EVSE budget to accommodate support for transit bus chargers could align Xcel not only with the standards set by peer utilities but could help bolster stated electrification and climate goals of major transit providers within its service territory.³⁶

Level 1 Charging Rebates

Finally, the CEGs recommend that Xcel develop a rebate tier for electrician-installed Level 1 EVSE. Although Level 1 charging is typically not as costly and installation is typically not as complicated as for Level 2 stations, doing so in a way that is electrically safe, networking for demand control, and providing billing solutions for site hosts can raise the costs to the point where rebates are helpful.³⁷ Thus, utility support in the Level 1 space can provide benefits, particularly for multifamily settings, in addition to limited L2 charging spaces.³⁸

Reliably accessible low-powered charging at assigned parking spaces may accommodate the needs of many multifamily residents more effectively than having non-guaranteed access to a limited number of non-assigned Level 2 charging stations in a parking area. Xcel should do more to support multifamily properties in particular in providing this infrastructure by expanding the Commercial Infrastructure Rebate Program to include EVSE rebates for Level 1 charging, with installation by a vetted electrician as an approved qualified expense under program terms and conditions.

³⁴ [Research from NREL](#) published in 2025 indicates that 90% of school bus fleets can be electrified with existing technologies and would require only 19.2 kW depot charging.

³⁵ This has been added as a suggested Pilot in Section VI of these comments.

³⁶ [Metro Transit's Bus Electrification Plan](#) includes targets for 20% of buses to be electric by 2030. Further stakeholder engagement is underway.

³⁷ For a case study of utility-supported low-powered EVSE at multifamily buildings see [this partnership](#) between Silicon Valley Clean Energy and Ecology Action in California. Examples of Level 1 networked technological solutions available from [Plugzio](#).

³⁸ For example, [Colorado Model Energy Codes](#) now allow for up to 50% of code-required EVSE-Ready Level 2 Spaces to be substituted by Level 1 EVSE-Installed spaces.

Overall Budget and Ambition:

As stated in the introduction to these comments, the CEGs believe that the overall budget and ambition for Xcel's transportation electrification activities falls short of not only what is prudent and aligned with other utility actions in similar states, but it also falls short of our state's climate goals. Underinvesting in transportation electrification would also be a missed opportunity to help lower the costs of transportation and help address electricity affordability issues through induced downward rate pressure. By adding additional equity eligibility criteria for higher rebate levels, raising overall DCFC rebate levels as suggested above and opening up rebates to transit buses and Level 1 installations, the CEGs believe that Xcel will need to increase its planned budget. In doing so, the CEGs project that Xcel will align its transportation electrification spending more closely with the other utilities displayed in Figure 1, all of which are spending more annually on a per customer basis.

The CEGs are supportive of the efforts within the Commercial Infrastructure Rebate Program. We believe that simplifying the process by providing flat rebate amounts will stimulate the investment in charging infrastructure. However, higher investments in additional underserved communities, higher incentive levels for public DCFC installations with higher power levels, access to EVSE rebates for transit buses, and financial support for installing L1 charging would help to make electric transportation desirable and accessible for all Minnesotans. The CEGs ask that Xcel and the DOC take these factors into account in their ECO Modification filing. The CEGs also wish to reiterate the importance of the continued development and implementation of the V2G School Bus Demonstration Project and ask the Commission to weigh in on this matter.

III. Residential Advisory Services and Guided Charging Installations Program Comments and Recommendations:

Xcel's Residential Advisory Services and Guided Charging Installations Program will provide significant benefits to Xcel customers. Enhanced advisory services and guided charging installations which are tailored to customer preferences will bolster the uptake of electric vehicles broadly, increase the participation of Xcel customers in managed charging programs, and improve overall customer experience.

Importance of Advisory Services

The CEGs support the proposed Residential Advisory Services and Guided Charging Installations Program. We hope these enhanced advisory services will increase participation in the Company's EV programs by improving customer awareness and streamlining the flow of information. Since most charging occurs at home, robust participation in residential managed charging programs is critical to efficiently integrate EV charging load and leverage it to improve grid flexibility and produce the downward pressure on rates described in Appendix B.

Beyond advertising for the Company's own programs, outreach efforts included in this program should improve EV adoption by increasing knowledge of EV benefits and help to improve customer understanding of EVs. The Company can play a valuable role in aggregating and conveying such information to customers directly and via the key trade allies it plans to work with such as auto dealers and electricians, as well as trusted messengers like HOURCAR and community organizations.

Phase Out of EV Advisor / Vehicle Selector Tool

Xcel proposes to phase out vehicle selector tools. The CEGs broadly support Xcel's proposed refined focus on charging rather than vehicle adoption, but we note that certain aspects of this online tool remain relevant. As Xcel notes, utility websites are not always where buyers go to evaluate their vehicle purchase options. However, the CEGs note that information regarding fueling costs, program eligibility, and in particular vehicle and charger eligibility for Xcel programs should be transparently advertised on the website. Redundancy with information provided by autodealers is not problematic, and there may be program eligibility questions best answered by Xcel's website. For example, OYC's proposed successor *Charging Perks* program will have restrictions on compatible vehicles and chargers, with Xcel estimating that they have access to data for only 46% of EVs on the road today.³⁹ Although Xcel's expertise may lie in providing charging solutions over the vehicles themselves, **Xcel should continue to provide some vehicle information on their website, particularly as it pertains to program eligibility.** Maintaining transparency about this information is critical to providing positive customer experiences with EVs.

Equitable Outreach Strategies

The CEGs appreciate Xcel's plans to diversify outreach strategies through this Residential Advisory Services program, and we offer some suggestions on how to better optimize this aspect of the program to increase effective outreach in underserved communities. In preparation for these TEP comments, Fresh Energy reached out on behalf of the CEGs to community organizations representing underserved communities to better understand the barriers to EV adoption in their communities and ways in which Xcel could better improve its outreach.⁴⁰ In these conversations, the organizations Native Sun Community Power Development and Communities Organizing Latine Power and Action (COPAL), which represent Native American and Latine communities in Minnesota, respectively, underscored the importance of working with trusted community organizations to reach marginalized and underserved people who might not otherwise seek out Xcel as a trusted resource. As an example, Native Sun Community Power Development conducts online and in-person community outreach and education on EVs and EV infrastructure for Tribal communities throughout the state. These organizations are better able to

³⁹ Docket No. E002/M-25-142. [Xcel's Transportation Electrification Plan](#) (October 31, 2025). Page 62.

⁴⁰ Organizations include Native Sun Community Power Development and COPAL.

meet people and demonstrate the benefits of these technologies where they live. Recognizing this, **the CEGs request that Xcel develop outreach strategies with trusted community organizations that go beyond the traditional marketing and outreach efforts described in the TEP** to bring better understanding of the cost savings and community health benefits of EVs to these groups.⁴¹

Support for Evie Carshare and HOURCAR

The CEGs also note that HOURCAR, like the community organizations described above, is a trusted resource with strong relationships to underserved communities. Xcel has voiced support for a continued relationship with HOURCAR in this TEP. The Company notes that a continued partnership with HOURCAR is included as a part of its Residential Advisory Program.⁴² However, there is no mention of HOURCAR in the Residential Advisory Services and Guided Charging Installations Program section (Section III Subsection B).⁴³ **The CEGs request that Xcel clarify the nature of the support to be given to HOURCAR and the Evie carshare program through this program.**

Overall Budget and Ambition

The CEGs support the budget for this program deeming it similar to approved outreach, marketing, and advisory service budgets for other utilities on a normalized annual basis.⁴⁴ With improvements to outreach strategies towards underserved groups and by improving information shared about vehicle qualifications for certain programs, such as *Charging Perks*, this budget can provide significant benefits to Xcel customers, the grid, and the climate.

IV. Charging Perks Comments and Recommendations:

In the proposed *Charging Perks* Active Managed Charging Program, Xcel would directly manage enrolled customers' EV charging schedule through a third-party software provider. This represents the Company's first foray into actively managing EV charging in Minnesota. Stakeholders and the Commission called for Xcel to develop such a program in the last TEP process.⁴⁵ Xcel notes that it is "critical to begin investment in active managed charging now" before EV adoption becomes widespread.⁴⁶ The CEGs agree, and we recommend **the Commission approve the *Charging Perks* program** with the requirement to discuss

⁴¹ Docket No. E002/M-25-142. [Xcel's Transportation Electrification Plan](#) (October 31, 2025). Page 15.

⁴² *Id.* Page 49.

⁴³ *Id.* Pages 58-61.

⁴⁴ See [descriptions of Illinois utilities' Beneficial Electrification Plans](#) provided by the Respiratory Health Association.

⁴⁵ [Commission Order accepting Xcel's 2023 Transportation Electrification Plan](#), Docket No. E-002/M-23-452 (May 9, 2024). Page 15.

⁴⁶ Docket No. E002/M-25-142. [Xcel's Transportation Electrification Plan](#) (October 31, 2025). Page 64.

alternative pathways to improve and expand managed charging in the company’s 2027 TEP, as discussed below.

Importance of Active Managed Charging

Managed charging in general, and active managed charging in particular, is an important practice for both lowering enrollees EV fuel costs as well as operating a lower cost grid to benefit all utility customers. A Union of Concerned Scientists (UCS) report on the potential grid savings from hourly managed charging showed significant net savings for all categories of electricity grid infrastructure relative to a baseline with a mix of unmanaged and passively managed charging (i.e., TOU rate enrollment).⁴⁷ While that study focused on California, the results show a directional relationship that is expected to hold for electricity grid infrastructure savings in other jurisdictions. Of particular note, the annual electricity delivery savings were the largest category of savings,⁴⁸ more than all of the generation and storage savings categories combined, even under binding renewable energy and decarbonization targets used in the study.⁴⁹ The significance of active managed charging savings over a time-of-use-only baseline underscores the importance of initiating active managed charging in Xcel’s Minnesota service area. In addition, the prominence of distribution system savings for each level of managed charging enrollment scenario in the analysis supports the company’s decision to offer a higher incentive for distribution system-optimized participants than the incentive offered to bulk system-optimized participants.

Beyond the importance of active managed charging for the value it can provide, managed charging is also a critical piece of grid-parallel bidirectional charging (also referred to as vehicle-to-grid or V2G): bidirectional charging to benefit the grid requires management of both charging and discharging. For that reason, establishing a strong foundation in managed charging, including through the *Charging Perks* program, is necessary to eventually capture value from V2G applications as well. The UCS study found that V2G can save two to four times the savings of managed charging alone.⁵⁰

Charging Perks Program Considerations

The CEGs support most program design choices within *Charging Perks*, including provisions to accommodate customer mobility needs through “ready by” times and the ability

⁴⁷ Houston, Sam, David Reichmuth, and Mark Specht. 2025. [*Harnessing the Power of Electric Vehicles: Integrating Light-Duty EVs with the Grid in California for a Cheaper, More Reliable, Decarbonized Electric System*](#). Cambridge, MA: Union of Concerned Scientists.

⁴⁸ In the study, “electricity delivery” represented both distribution and transmission systems. The vast majority of the savings in this category were gained on the distribution system. See *Id.* Page 16.

⁴⁹ *Id.* Page 16-17.

⁵⁰ *Id.* Page 14.

for the customer to opt out of the optimized schedule when needed.⁵¹ While the CEGs appreciate and support *Charging Perks* proposal overall, we note several issues that will have to evolve within the program or in future offerings to scale up managed charging in a cost-effective way.

First, the CEGs are concerned that *Charging Perks* has inherited the “cost effective challenges” of Optimize Your Charge,⁵² which are attributed to “required” agreements with the automaker, charger manufacturer, or a third party aggregator and “the fees associated with this communication access.”⁵³ The CEGs understand the company’s choice to “leverage the data infrastructure and vendor networks” of Optimize You Charge using the “same set of software vendors”⁵⁴ in order to get *Charging Perks* up and running as soon as possible. At the same time, we strongly recommend the company explore whether less costly methods for active managed charging are feasible (or will become feasible in the future) to improve the cost effectiveness of the program. The CEGs see exploring different approaches for actively managing charging as an important complement to other factors that will tend to increase the value of active managed charging efforts, such as increased renewable energy generation.⁵⁵

Beyond cost, the current approach of working through manufacturer agreements presents limitations to participation that could affect efforts to scale active managed charging. In order to enroll in *Charging Perks*, customers “must have a vehicle or charging station covered by these agreements to participate.”⁵⁶ By the company’s estimation, existing agreements cover only “46 percent of vehicles on the road today.”⁵⁷ In other words, more than half of vehicles would not be able to participate in the program currently. Although new agreements may be inked in the future, a strategy that relies on an increasingly diverse array of auto and charger manufacturers to make agreements with utilities or software providers presents a real and serious risk of cutting out a large number of customers from active managed charging opportunities and forgoing the potential grid benefits that could come with their enrollment. For this reason, the CEGs recommend the company explore approaches to active managed charging that do not rely solely on specific companies and that do promote the ability of all EV customers to participate, regardless of equipment manufacturer.

⁵¹ Docket No. E002/M-25-142. [Xcel’s Transportation Electrification Plan](#) (October 31, 2025). Pages 62, 66.

⁵² *Id.* Page 62.

⁵³ *Id.* Page 40.

⁵⁴ *Id.* Page 61, 62.

⁵⁵ *Id.* Page 62.

⁵⁶ *Ibid.*

⁵⁷ *Ibid.*

The CEGs recommend the Commission approve *Charging Perks* and require Xcel to undertake the exploration of lower cost and OEM-agnostic active managed charging and to file a discussion of the findings in the 2027 TEP.

V. EV Charging Rates and Related Topics

In addition to the three newly proposed programs described in sections II, III, and IV above, Xcel proposed several modifications to residential EV-specific rates. Xcel also provided analysis and comments regarding the need for a residential EV rate with a longer off-peak period for Level 1 charging and regarding demand charges within its EV rate for public charging. The CEGs are supportive of changes to EVAAH which will enable participation in the program by net-metered solar customers and are also supportive of expanding eligibility for the Home Wiring and EV Charger rebates to participants in whole home TOU rates. However, the CEGs disagree with Xcel’s conclusion that there is no need for further rate offerings to optimize costs to customers and associated grid benefits of both residential and commercial EV charging.

Changes to EVAAH

The CEGs are strongly supportive of changes to EVAAH which move to allow net-metered solar customers to participate in the program. This customer group is often highly motivated to minimize their costs and climate impact, and this change will help Xcel customers in aligning themselves with Minnesota’s distributed generation and clean transportation goals.

Rates Eligible for Rebates

The CEG are strongly supportive of Xcel’s proposal to expand eligibility for the EV Charger and Home Wiring Rebates to customers on whole home TOU rates and customers enrolling in the proposed *Charging Perks* Program. These programs both offer incentives for managed charging which generates downward pressure on rates. This downward pressure is part of the justification for these rebates, and thus eligibility is warranted.

Residential EV Rate Compatibility with L1 Charging

As a part of recent Residential Time of Use Rate development proceedings, Xcel was ordered to “*provide an analysis of its existing residential electric vehicle charging rates to accommodate longer off-peak time periods that allow for Level 1 charging and the ability to stagger the start time of electric vehicle charging in its Transportation Electrification Plan*”. In response, Xcel provided a summary of its EV offerings and recommended no changes. The CEGs are sympathetic to the view that Xcel already offers several rate options for EV drivers and that adding more options would only add complexity, but note that according to a 2023 survey from

Plug in America, 20% of EV drivers only use Level 1 charging at home.⁵⁸ No existing rate option is well suited to accommodate these drivers or incentivize them to charge off-peak that does not require expensive upgrades to add a second meter or participation in a whole home TOU rate.

In evaluating the efficacy of Xcel's EV offerings, it is important to note that only an estimated 14% of EVs in Xcel's territory are under EV specific TOU rates. This low figure is likely somewhat offset by residents on whole home TOU rates and households with multiple EVs, but this nonetheless reflects that there is significant room for improvement in Xcel's EV rate offerings to ensure that customers are incentivized to charge at times that are beneficial for the grid. To address this, **the CEGs recommend that Xcel investigate expanding eligibility for the EVAAH program to allow for participation by customers using Level 1 charging.** Doing so will allow customers for whom Level 1 charging is sufficient to access lower off-peak rates for EV charging without installing a second meter or needing to change their non-EV electricity use patterns to avoid on-peak energy charges for less flexible appliances like refrigerators.

Changes to EVAAH and MDU Pilot Energy Rates

Xcel proposes to align rates for the EVAAH Program and the (now closed) MDU Pilot with currently proposed (but unapproved) residential TOU rates. Although these rates have been linked, the CEGs believe there is justification to reexamine the relationship between these rates. Whole home TOU rates and EV Specific Rates such as those contained in EVAAH Program provide similar incentives to customers to change their electricity use to times when the grid is less constrained, lowering costs for the utility. However, the flexibility of EVs and typical household electricity use is different, and this difference justifies varied approaches in rate design. Whereas whole home TOU rates should be designed to incentivize switching to off-peak electricity usage where possible while avoiding being overly punitive to unavoidable on-peak electricity use,⁵⁹ EV charging is generally more flexible. EV rates can be much more tuned towards minimizing the costs of off-peak charging, thus maximizing the shift towards grid-beneficial charging and providing the maximum fuel savings for drivers to switch from ICE vehicles to EVs. The grid benefits that can be realized by modifying customer behavior through variable rates justify the higher discrepancy between on and off-peak rates.

In principle, the CEGs are not opposed to increases in energy charges when needed to accommodate changes in the cost of service. As Xcel notes on Page 25 of the TEP, EVAAH's costs currently exceed revenues. However, the current proposal which aligns the rates of the EVAAH program and MDU EV Pilot with increases to off-peak rates in the whole home TOU rate nearly doubles the price of off-peak electricity for participants of these rates. Currently, the

⁵⁸ See [Plug in America's 2023 EV Driver Survey](#)

⁵⁹ This principle is reflected in Docket No. E002/M-23-524 where changes to Xcel's Residential TOU Rate proposes to lower the on-peak electricity charge and increase the off-peak electricity charge.

EVA AH program prices off-peak electricity at \$0.03825/kWh for both winter and summer months, which enables significant savings for participants who are able to charge primarily overnight. The new rate would be \$0.0749. The current rate has been successful, with Xcel’s most recent EV Annual Report noting 87% of charging by EVA AH participants happened during the off-peak period with a remaining 11% mid-peak. Maintaining off-peak charging prices at less than 4 cents per kilowatt-hour may be unsustainable, but doubling energy charges should not happen overnight, particularly in the wake of recent state and federal policy changes which have adversely impacted EV owners. Minnesota’s EV registration fee more than doubled in the last state legislative session and federal tax credits for EV purchase were repealed in the One Big Beautiful Bill.⁶⁰

The proposed increase to the off-peak rate is likely to generate negative feedback and disincentivize switching to an electric vehicle at a time when EV owners are already under financial pressure from increased costs. It will also disincentivize existing EV owners currently on unmanaged EV charging from switching to a managed charging rate by reducing the savings produced by enrolling in an EV rate and charging overnight.⁶¹ For these reasons, **the CEGs recommend the Commission direct Xcel to refile a more modest interim increase to EV Program off-peak energy rates, as well as adjustments to customer monthly charges, to match program revenues with costs while delaying the full alignment of EV rates with the whole home TOU rate until the issue can be further studied.** This more gradual, measured, and well-informed shift will mitigate the short-run negative impacts of rate shock for EV program participants and continue to incentivize customers buying EVs and those with EVs switching to mutually advantageous managed charging programs.

Public EV Charging Rate Design

Although support for the construction of public charging infrastructure through rebates is important,⁶² Xcel has not proposed any additional support for the affordable operation of these chargers by designing and offering permanent electric rates specific to EV charging. On page 42, Xcel states “Public charging providers are provided service on the Electric Vehicle Public Charging Pilot Service”. However, Xcel later notes that this Public Charging Pilot and the associated Public EV Charging A90 rate are now closed. Even if this rate remained open to new customers, it still insufficiently mitigates the negative impacts of demand charges on public EV charging. Although the CEGs are again sympathetic to Xcel’s perspective that these rates need to cover the cost of service, Xcel should take action to reevaluate its offerings in this space in its

⁶⁰ See reporting on Minnesota’s EV Registration Fees from [Drive Electric Minnesota](#) and [updated tax credit guidance from the IRS](#)

⁶¹ Vehicle registration data available on the [Minnesota PUC website](#) estimates 44,620 EVs in Xcel’s service territory as of November 2024. Xcel’s [May 2025 EV Annual Report](#) filing records 1,650 customers on the residential EV charging service tariff and 4,678 participating in EVA AH as of March 2025 (totaling 6,328, implying approximately 14% of EVs in the service territory are enrolled in a managed charging rate).

⁶² See CEG comments in Section II pertaining to the Commercial Infrastructure Rebate Program

next rate case and develop a new Public EV Charging Rate, potentially offered in conjunction with active managed charging.

The A90 rate contains monthly demand charges of up to \$16.49/kW for on-peak electricity and also contains off-peak demand charges. This results in bills, even for public Level 2 chargers, that are significantly higher overall than for delivering the same energy for EVs to single family homes in Xcel's service territory. These punitive cost structures disproportionately impact underserved Xcel ratepayers that rely on public charging or Evie carshare for their transportation needs. To make access to electric transportation options accessible for low- and moderate-income Minnesotans, as directed by Minnesota Statute 216B.1615 Subdivision 3, **the CEGs recommend that the Commission direct Xcel to design a new rate for public charging in its next Rate Case with greater incentive for charging off-peak and lower demand charges.** In particular, the CEGs recommend that Xcel explore expanding the demand charge limiter, institute a demand charge holiday, or include a rate that uses alternative structures to demand charges which may include active managed charging. This will facilitate more affordable deployment and operation of public charging and help residents that rely on public charging save money while helping reduce grid stress.⁶³ Managing this charging would help ameliorate costs to both Xcel and Xcel's most vulnerable ratepayers. A more equitable and affordable EV rate which takes into account the specific challenges of providing EV charging would also provide benefits to fleet electrification and maintain the cost-competitiveness of public EV charging with fueling for ICE vehicles.

VI. Future Programming Recommendations:

The CEGs feel that the new programs offered in this TEP are all worthwhile improvements to existing pilots and offerings. These new programs address some major gaps and will help support the transition to electric vehicles. However, significant barriers to EV adoption will remain, particularly for under-resourced Minnesotans. Below, we will outline various potential future utility programs that could fill the gaps and help bring down these barriers.

ECO Programs

The two ECO programs described in this TEP (Commercial Infrastructure Rebate Program and Residential Advisory Services and Guided Charging Installation Program) are important additions to Xcel's transportation electrification programming, but more can be done through ECO to support vehicle adoption. Utilities have been enabled by ECO's Technical Resource Manual to propose rebates for vehicles such as EVs and E-Bikes.⁶⁴ Minnesota's other two Investor Owned Utilities have taken steps to provide incentives for electric vehicle purchase,

⁶³ Docket Nos. E002/M-18-643 and E002/M-20-711. [Xcel's EV 2025 Q3 Report](#), (August 29, 2025). This report indicates that the public charging pilot has the highest on-peak rate of all Xcel's pilots.

⁶⁴ [Technical Resource Manual Version 5.0](#) (January 9, 2026). See recommended calculations for EVs on Pages 278-282 and for E-Bikes on Pages 286-289.

with Otter Tail Power having new and used EV rebates in place since 2024, and Minnesota Power recently filing an ECO modification which includes proposed rebates for new and used EVs in Q4 of 2025.⁶⁵ **The CEGs recommend that Xcel pursue rebates as well, which are particularly needed for low to moderate-income households in the wake of the repeal of federal tax credits supporting EV purchases.**

Additionally, the CEGs recommend that Xcel reexamine electric-assisted bicycle (E-Bike) rebates. Xcel initially proposed E-Bike rebates through an ECO modification proposal which also included electric lawncare equipment, but the DOC denied the inclusion of E-Bikes without prejudice on the basis of wanting to study the magnitude of the fuel switching from full size Internal Combustion Engine (ICE) vehicles to electric bicycles in the next Technical Resource Manual (TRM).⁶⁶ The Department of Commerce noted in this decision that they “intend to work on developing this measure in consultation with the Minnesota TRM Advisory Committee. If a measure is successfully developed for the TRM, Xcel may at that time submit a modification to its Triennial Plan.”⁶⁷ As of the writing of this docket, the TRM is finalized with the successful inclusion of E-Bikes. Minnesota Power has already proposed E-Bike rebates in its October 2025 ECO Modification request.⁶⁸ **Xcel should follow suit and move forward to re-propose its E-Bike rebates under ECO in the near future.**

Potential Future Pilot Programs

With this TEP, Xcel is sunsetting several pilot programs related to EVs and replacing them with full programs, which marks the success of the pilots in developing new business areas for Xcel. However, the end of these EV pilots does not mean that there is not a need for new pilots exploring new ideas within the EV space. Xcel should take lessons from both the successes of its current offerings and from transportation electrification efforts in other utility jurisdictions to increase its ambition and explore new pilots through either the ECO program or through future TEP filings including, but not limited to:

- Development of an Active Managed Charging Program for ESBs, Transit Vehicles, or other commercial-scale EV fleet operators.
- Make-ready infrastructure for charging-enabled docking stations for electric bikeshare.⁶⁹
- Develop a Pilot to support and facilitate the use of existing utility pole infrastructure for curbside EV charging.⁷⁰

⁶⁵ Docket No. E015/CIP-23-93. [Minnesota Power ECO Modification Request](#), (October 28, 2025).

⁶⁶ Docket No. E002/CIP-23-92. [Xcel's 2024-2026 ECO Triennial Plan Decision](#), (December 1, 2023). Page 120.

⁶⁷ *Ibid.*

⁶⁸ Docket No. E015/CIP-23-93. [Minnesota Power ECO Modification Request](#), (October 28, 2025).

⁶⁹ Programs supporting electrified docking stations have been done by utilities ComEd in [Chicago](#) and ConEd [New York](#).

⁷⁰ Pilots for streetlight or utility pole EV charging have been developed in numerous cities including [Kansas City](#) and [Burlington](#).

- Developing incentives to combine BESS or Microgrids with DCFC to ameliorate local grid stress.⁷¹
- Creating new V2X residential programs, such as enhanced rebates for V2X enabled chargers and expanding EV Accelerate at Home to accommodate V2X capable chargers.
- Working with MnDOT and transit agencies on new concepts such as inductive charging at bus stations and optimizing the managed shared use of electric infrastructure for light rail and EV charging.⁷²

VII. Conclusion

There is significant work to be done in both improving the proposed TEP and in developing future utility programming to support transportation electrification, Xcel's TEP begins an important process in shifting utility focus to providing a simplified model towards investing in charging infrastructure, improving customer engagement, and in developing a new framework for incentivizing active managed charging. In the above sections, the CEGs have outlined recommendations for improving these proposed programs and have identified gaps where programming should be developed in the future. Although the mechanisms for approval and timelines may differ, these recommendations are all aimed at a future where all Minnesotans can affordably choose sustainable transportation options.

Topic 1: The CEGs recommend **approval** of the TEP with the modifications identified in Topics 2, 3, 4, and 5 below.

Topic 2: The CEGs have identified the following major gaps in transportation electrification programming and request that the Commission direct Xcel to develop new programs, tariffs, and incentives to fill these gaps in future TEP filings, rate cases, or, through future ECO proceedings.

- The overall ambition of Xcel's TEP lags behind both the standards set by peer utilities and Minnesota's policy goals as described in Section I.
- Xcel should improve the proposed Commercial Infrastructure Rebate Program to adequately address various charging needs of multifamily dwellings, transit providers, and public DCFC installations as described in Section II.
- Xcel should improve outreach and marketing in the proposed Residential Advisory Services and Guided Charging Installation Program by working with community-based groups that have better trust within underserved populations, as discussed in Section IV.

⁷¹ See Colorado PUC Proceeding Number 23A-0244E. [Xcel's 2024-2026 TEP Proposal](#) (April 10, 2024). Page 8. This pilot was ultimately not adopted by the Colorado PUC.

⁷² See [partnerships from Salt Lake City](#) where utility Rocky Mountain Power and the Utah Transit Authority have partnered on numerous transit electrification projects, including efforts to manage EV charging during spikes to Light Rail's electricity use. Also see reporting from [SmartCitiesDive](#) on the issue of inductive charging to support transit electrification.

- The Commission should direct Xcel to develop EV-specific rates that better serve the needs of EV owners using Level 1 charging and those providing publicly available charging, as discussed in Section V.
- The Commission should direct Xcel to develop future pilot programs to expand its transportation electrification programs in future dockets, as discussed in Section VI.

Topic 3: The CEGs recommend **approval** of the proposed changes to the EVAAH program to expand program eligibility to net-metered solar customers.

Topic 4: The CEGs recommend **approval** of the proposed *Charging Perks* program and request that the Commission direct Xcel to explore future alternatives for administering managed charging programs with lower fees, as described in Section IV of these comments.

Topic 5: The CEGs recommend that the Commission **direct Xcel to modify and refile** the proposed EV related energy and monthly customer charge changes as described in Section V. In particular, the CEGs recommend approval of a more modest increase to off-peak energy charges for participants in the EVAAH Program and MDU EV Pilot to align cost of service with revenues while avoiding rate shock for program participants.

Topic 6: The CEGs reserve the right to add additional comments and suggestions not included in this filing during the Reply Comment Period.

This is not the time to pull back on our ambition for transportation electrification, and we appreciate the effort of Xcel in providing a comprehensive vision within this docket. We hope that Xcel, the Department of Commerce, other Stakeholders, and the Commission will rise to the occasion and continue to increase our ambition and leadership on the important issues of climate justice, affordability, and equity through this TEP process. The CEGs believe that our recommendations, if adopted, will benefit Xcel's customers by providing downward pressure on rates, improve air quality, reduce climate emissions, and provide affordable and sustainable electric transportation options that are accessible to all customers. Thank you for the opportunity to participate in this docket.

Sincerely,

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Appendix A: Peer Utility Comparisons

Total Utility Spending:

To compare utility spending on transportation electrification in utilities that vary in size and across states where transportation spending is approved in varying time increments, the CEGs developed a simple methodology to compare spending on an annualized per customer basis. Using this methodology, the CEGs collected a non-exhaustive sample of peer utilities in similar states to Minnesota. The calculations and sources are described and cited below:

- **Ameren, Illinois** has approximately 1.2 million electric customers.⁷³ On March 27, 2025 the Illinois Commerce Commission approved \$86.7 million for transportation electrification programming for three years (2026-2029) through its Beneficial Electrification 2 Plan.⁷⁴ This leads to an annual budget of \$24.08 per customer on transportation electrification.
- **ComEd, Illinois** has approximately 3.8 million electric customers.⁷⁵ On March 27, 2025 the Illinois Commerce Commission approved \$168 million for transportation electrification programming for three years (2026-2028) through its Beneficial Electrification 2 Plan.⁷⁶ This leads to an annual budget of \$14.7 per customer.
- **DTE, Michigan** has approximately 2.3 million electric customers. On January 31st, 2025, the Michigan PUC approved approximately \$125 million in spending for transportation electrification in infrastructure rebates across 4 years (2025-2028). We thus calculated annual spending at \$13.6 per customer.
- **Xcel, MN** has approximately 1.5 million electric customers in Minnesota. According to Table 3 within the 2025 TEP, Xcel has spent \$35.7 million on transportation electrification programs between 2021 and 2025 (4 years) leading to a calculation of annual transportation spending of \$5.95 per customer. In the 2025 TEP, Xcel proposed a four year budget of \$61.1 million leading to a calculation of \$10.18 per customer annually.
- **Xcel, WI** has approximately 265,000 electric customers and has an approved TE spending of \$9 million across 5 years (2022-2026). This is calculated to be \$6.79 per customer annually.⁷⁷
- **Xcel, NM** has approximately 150,000 electric customers and has an approved TEP of \$23.1 million across three planning years, giving us a calculation of \$51.3 in annual spending per customer.

⁷³ <https://www.ameren.com/-/media/corporate-site/files/aboutameren/amerencorporatefactsheet.ashx>

⁷⁴ Available at: <https://www.icc.illinois.gov/docket/P2024-0494/documents/363210/files/636045.pdf>

⁷⁵ <https://www.ilcma.org/friends-of-ilcma/comed/>

⁷⁶ Available at: <https://www.icc.illinois.gov/docket/P2024-0484/documents/363213/files/636050.pdf>

⁷⁷ Xcel's [NSPW Territory](#)

- **Xcel, CO** has approximately 1.5 million electric customers,⁷⁸ making it extremely similar to Northern States Power in Minnesota. PSCo’s 2024-2026 TEP was approved March 13, 2024 with a budget of \$264 million across 3 years.⁷⁹ This works out to transportation spending of \$58.67 annually per customer. In its 2025 TEP, Xcel notes that approved spending in Colorado is actually higher at \$372 million.⁸⁰ The CEGs did not verify the timeframe for all of this spending and thus are only using approved 2024-2026TEP spending for our calculations.

Rebate Amounts:

The comparisons between utility DCFC rebates include breakdowns between support for EVSE and EVSI.

- **DTE, MI** offers \$50,000 rebates for on-route 150kW DCFC, with up to \$70,000 available for chargers located in rural or disadvantaged communities.⁸¹
- **Consumers Energy, MI** offers \$70,000 rebates for on-route 150kW DCFC. This number is additional to ‘Make-Ready’ support provided by Consumers Energy for infrastructure up to the customer meter.⁸²
- **Ameren, IL** offers make-ready rebates of \$300/kW for DCFCs (\$500/kW for DCFC located in low-income or equity qualifying areas). For a standard 150kW DCFC installation this represents between \$45,000 and \$75,000.⁸³
- **ComEd, IL** offers make-ready rebates of \$1,000/kW for DCFCs. They do not offer EVSE rebates, however, a standard 150kW qualifies for \$150,000 which represents the highest level of support by any utility on this list.⁸⁴
- **Xcel, MN** is proposing rebates through the Commercial Infrastructure Rebate Program which amount to between \$13,000 and \$20,000 for EVSI and between \$25,000 and \$35,000 for EVSE, based on EJ Status. The combined rebates sum to \$38,000 for standard customers and \$55,000 for EJ customers.
- **Xcel, CO** has approved rebates through a Commercial Infrastructure Rebate Program that is similar to the program proposed in Xcel’s 2025 TEP for Minnesota. The Colorado program offers between \$45,000 and \$90,000 rebates for EVSI (higher amounts for Disproportionately Impacted Communities) and between \$0 and \$40,000 for EVSE (higher amounts for higher powered chargers as well as for DICs). The combined rebates

⁷⁸ See Colorado Energy Office [Current Energy Profile](#)

⁷⁹ See Colorado PUC Decision on [Xcel’s 2024-2026 TEP](#)

⁸⁰ Docket No. E002/M-25-142. [Xcel’s Transportation Electrification Plan](#) (October 31, 2025). Page 21.

⁸¹ See [DTE Public EV Charger Rebates](#)

⁸² See [Consumers Energy DC Fast Charger Rebates](#)

⁸³ See Ameren [ChargeReady Program](#)

⁸⁴ See ComEd’s [Electric Vehicle Programs](#) as well as [ComEd’s Beneficial Electrification Plan 2](#), Page 16.

are \$45,000 for standard customers and up to \$130,000 for 350kW+ chargers located in DICs.⁸⁵

- **Xcel, NM** offers similar rebates to Xcel in Colorado. The EVSI rebate is \$39,000 and EVSE rebates scale from \$35,000 for lower-powered DCFC (50-149kW) to \$105,000 for chargers at 350kW+. The combined DCFC rebates thus are between \$74,000 and \$144,000.⁸⁶

⁸⁵ See [Xcel \(PSCo\) Commercial Infrastructure Rebate Program](#)

⁸⁶ See [Xcel \(SPS\) Commercial Infrastructure Rebate Program](#)

Appendix B: Benefits of Transportation Electrification

Electric vehicles continue to provide climate, health, and grid benefits, with many of these benefits becoming more clear since the Commission’s initial investigation into electric vehicles.⁸⁷ Below these benefits are summarized and updated with the latest findings.

Greenhouse Gas Reduction

Numerous independent studies spanning well over a decade have come to the same conclusion: reducing global warming pollution to the levels required to avoid the worst impacts of climate change will require a dramatic shift to EVs powered by renewable and other zero-carbon energy sources.⁸⁸ EVs are cleaner than gasoline and diesel vehicles today and will become even more so as the energy mix used to make and charge the vehicles continues its transition from fossil fuels to cleaner sources.⁸⁹

A report by research firm MJ Bradley & Associates (now ERM) found a mass market for light-duty EVs consistent with meeting the state’s long-term greenhouse gas reduction goals would reduce annual greenhouse gas emissions in Minnesota by over 17 million tons per year for light-duty vehicles alone, leading to \$10.4 billion cumulative net benefits from greenhouse gas reductions by 2050.⁹⁰

Public Health

In addition to reducing greenhouse gas emissions and the associated climate impacts, electrifying transportation would have tremendous public health benefits by reducing local air pollution. In their 2022 “Life and Breath Report: Greater Minnesota,” the Minnesota Department of Health and Pollution Control Agency found adverse health impacts from fine particles and ozone pollution in several cities in Greater Minnesota, including Saint Cloud, located in Xcel’s service

⁸⁷ Minnesota Public Utilities Commission, Docket No. CI-17-879. [Order Making Findings and Requiring Filings](#), February 1, 2019.

⁸⁸ See, e.g., Pinto de Moura, Maria Cecilia, 2022, [Low Carbon Pathway for Transportation: Ramping up vehicle electrification and phasing out petroleum](#), Union of Concerned Scientists, Williams, J.H. et al., “Pathways to Deep Decarbonization in the United States,” Energy and Environmental Economics, Inc. (E3), November 2014; Williams, J.H. et al., “The Technology Path to Deep Greenhouse Gas Emissions Cuts by 2050: The Pivotal Role of Electricity,” *Science* 335, no. 6064 (January 2012): 53-59; Melaina, M. and K. Webster, “Role of Fuel Carbon Intensity in Achieving 2050 Greenhouse Gas Reductions within the Light-Duty Vehicle Sector,” *Environ. Sci. Technol.* 45, no. 9 (2011): 3865–3871; International Energy Agency, “Transport, Energy, and CO2: Moving Towards Sustainability,” OECD/IEA, 2009; National Research Council, “Transitions to Alternative Vehicles and Fuels,” (Washington, D.C.: The National Academies Press, 2013).

⁸⁹ Reichmuth, David, May 2024, [“Driving on Electricity is Now Much Cleaner than Driving a Gasoline Car”](#), Union of Concerned Scientist, *The Equation*.

⁹⁰ M.J. Bradley & Associates, July 2018, [“Plug-in Electric Vehicle Cost-Benefit Analysis: Minnesota”](#), (hereinafter MJB&A Analysis)

territory.⁹¹ The report also found that communities in these cities with higher percentages of “low-income residents, Black, Indigenous or People of Color residents, uninsured residents, or residents living with a disability have the highest estimated air pollution-related death and disease rates,” and estimated that air pollution contributed to 67 early deaths in Saint Cloud in 2015.⁹² A 2020 study from the Union of Concerned Scientists found that state-wide, African Americans and Latino residents are exposed to road vehicle PM 2.5 levels that are 65% and 28% higher, respectively, than the average Minnesotan resident, while White residents are exposed to levels that are 9% lower than the average.⁹³

Swapping gas and diesel vehicles for EVs helps alleviate some of this air pollution, particularly in the more densely populated urban areas where their impacts are most concentrated. MJ Bradley & Associates estimate that EV adoption consistent with meeting the state’s long-term greenhouse gas reduction goals could provide cumulative \$700 million in health and other societal net benefits from reduced emissions of nitrogen oxides (NOx, a precursor to smog and fine particulate matter pollutant⁹⁴) by 2050.⁹⁵

Grid Services

EVs have great potential to enhance the efficient use of grid resources and provide grid services, including the incorporation of renewable energy, through both smart charging and, in some cases, power export. Grid efficiency and services from EVs will lead to benefits for all utility customers, and successful implementation of utility EV programs and rate options can both accelerate transportation electrification and enhance the benefits those EVs can offer. According to the MJ Bradley & Associates analysis, the deployment of EVs consistent with the state’s long-term goals could lead to \$10.2 billion in reduced electric bills for customers by 2050.⁹⁶ Analysis completed in June 2024 by Synapse Energy Economics with the Natural Resources Defense Council show these benefits are already being realized, with EVs providing an estimated \$16.9 million in net revenue to all utility customers in Minnesota between 2011 and 2021.⁹⁷

In total, the MJ Bradley & Associates analysis finds that light-duty EVs adoption consistent with meeting the state’s long-term greenhouse gas reduction goals could provide cumulative net benefits of over \$30 billion to the state of Minnesota by 2050, with greenhouse gas reduction, NOx reductions, customer bill savings, and EV driver operating cost savings taken together.⁹⁸

⁹¹ Minnesota Department of Health and Minnesota Pollution Control Agency, 2022, [Life and Breath: Greater Minnesota](#).

⁹² *Id.* at Table 1

⁹³ Moura, February 2020, “[Who Breathes the Dirtiest Air in Minnesota?](#)”

⁹⁴ O’Dea, Jimmy. “[Ready for Work](#)” Union of Concerned Scientists, December 2019. Page 2.

⁹⁵ MJB&A Analysis

⁹⁶ *Id.*

⁹⁷ Synapse Energy Economics, [EVs Are Driving Rates Down For All Customers](#), June 2024. Page 14.

⁹⁸ *Id.*