

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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March 13, 2026

**RE: In the Matter of Minnesota Power’s 2025 Transportation Electrification Plan
Docket No. E015 /M-25-140**

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

Fresh Energy, Union of Concerned Scientists, Sierra Club, and the Environmental Law and Policy Center (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 5-8, Minnesota Power’s Transportation Electrification Plan (TEP) initially filed on November 3, 2025.² We appreciate the opportunity to participate in this docket and look forward to working with the Commission, Minnesota Power, and other stakeholders to improve the proposal to further support transportation electrification efforts in Minnesota Power’s service territory.

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

- The Commission to direct Minnesota Power to propose a make-ready program for commercial fleets as a supplemental filing to this TEP.
- The Commission to direct Minnesota Power to develop a program incentivizing grid-optimizing electric vehicle charging that does not require the installation of a second meter.

¹ Docket No. E015/M-25-140. [Notice of Comment Period](#) (November 13, 2025) Topics 5-8

² Docket No. E015/M-25-140. [Minnesota Power’s Transportation Electrification Plan](#) (November 3, 2025).

- The Commission to direct Minnesota Power to survey customers on how existing commercial offerings could be improved and increase uptake in existing programs.
- The Commission to direct Minnesota Power to include a fleet advisory services program in its ECO Triennial.
- The Commission to direct Minnesota Power to include rebates for Electric Buses, including transit buses and school buses, as a Modification to the current ECO Triennial and to include these in the next Triennial.
- The Commission to direct Minnesota Power to develop other future pilot offerings, such as support for electric carshare in its service territory.

Additionally, the CEGs appreciate Minnesota Power's initiative to bring forward rebates for EVs and electric bikes (e-bikes). This ECO Modification was recently approved by the Department of Commerce (DOC) and should increase adoption of electric vehicles in Minnesota Power's service territory, particularly for underserved groups that receive enhanced rebates through the program.³ The CEGs support Minnesota Power developing further programming supporting transportation electrification in its forthcoming ECO Triennial, including advisory services and Electric School Bus rebates as indicated in this TEP.

I. Introduction:

Electric Vehicles are now a proven technology with demonstrated benefits for consumers, the electric grid, public health, and the climate.⁴ 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.

Minnesota Power has made significant progress in standing up programs which should make it easier for customers to electrify their transportation. The CEGs particularly appreciate Minnesota Power's leadership in the electrification efforts of the Duluth Transit Agency, collaboration with tribal organizations on installing EV charging stations, the recently approved EV charging pilot for multifamily residents, and the recently approved rebates for e-bikes and EVs.

Despite these successes, Minnesota Power 2025 TEP would underinvest in transportation electrification. The company has spent just \$3,742,669 over the past 5 years, which amounts to \$5 per customer per year.⁵ On the other hand, Minnesota Power's projected transportation

³ Docket No. E015/CIP-23-93. [Decision on Minnesota Power's ECO Modification Request](#) (February 4, 2026). Page 2.

⁴ A more complete summary of the benefits of EVs is available in Appendix A. 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.

⁵ Docket No. E015/M-25-140. [Minnesota Power's Transportation Electrification Plan](#) (November 3, 2025). Page 21.

electrification spending for the next 5 years amounts to just \$2,016,000, a significant decrease. Even including an estimated \$160,000 in transportation electrification spending from the approved ECO Modification proposal, the company is slated to spend only \$3 per customer per year over the next five years.⁶

The lack of new programming in this TEP represents a missed opportunity to renew Minnesota Power's focus on transportation electrification at a time when investments should accelerate. Furthermore, providing estimates for future transportation electrification spending in this TEP which exclude ECO spending prevents stakeholders and customers from understanding the holistic picture of Minnesota Power's plans for the transportation sector, which should be the goal of the TEP. Although these ECO plans may not have been finalized at the time of filing, the CEGs ask that **Minnesota Power further clarify their intentions and estimated ECO investments in transportation electrification in their Reply Comments.** In light of the low levels of investment on transportation electrification, the CEGs recommend that the Commission direct Minnesota Power to expand its programming and help bring about the associated benefits described in Appendix A, including downward pressure on rates, air quality improvements, and climate benefits. Our specific recommendations for additional programming are outlined in Sections II, III, and IV below.

II. Commercial EV Programming

As noted in its IDP, Minnesota Power's customer base is skewed towards commercial and industrial customers.⁷ With this in mind, it is reasonable for Minnesota Power to have a robust and innovative portfolio of commercial and industrial fleet electrification initiatives. These initiatives can help decarbonize these sectors while helping customers save money on their operating costs. They can also help optimize the use of the existing electric grid and save money for all Minnesota Power customers.

Minnesota Power's TEP highlights some significant achievements in the commercial space in the development of EV-specific rates for both fleets and public charging. These rates will serve as a foundation for future electrification, allowing both charging providers and fleets to have high visibility into their operating costs. The CEGs appreciate Minnesota Power bringing attention to these rates and support their continuation. However, Minnesota Power notes in its TEP that there are 74 public EV charging stations in its service territory, but only 17 participate in its Commercial Public EV Charging Rate.⁸ Furthermore, Minnesota Power has worked with just

⁶ The recently approved ECO Modification for EFS measures includes about 16% of total spending for transportation measures, which would add an additional \$160,000 to Minnesota Power's transportation electrification spending for 2026, although this figure is approximate based on information provided in [Minnesota Power's October 28, 2025 ECO Modification Request](#).

⁷ Docket No. E015/M-25-140. [Minnesota Power's Integrated Distribution Plan](#) (November 3, 2025). Page 11.

⁸ Docket No. E015/M-25-140. [Minnesota Power's Transportation Electrification Plan](#) (November 3, 2025). Page 11-12

two fleets to explore fleet electrification, with only one fleet participating in the commercial rate.⁹ To better understand limited uptake of these commercial offerings, the CEGs recommend that the Commission **direct Minnesota Power to survey potential commercial and public EV charging customers on how existing offerings could be improved to increase uptake and report these findings in their upcoming EV annual report.** If Minnesota Power has already performed customer outreach in this space, we ask that they provide findings in their Reply Comments. Following this survey, the CEGs recommend that Minnesota Power develop a plan for how existing offerings might be improved to improve uptake.

One potential solution to improve uptake of vehicle electrification for commercial customers is to provide support in the form of make-ready rebates, contingent on enrollment in the existing Commercial EV Charging Rate. The original make-ready EV charging pilot filed as a supplement to the previous TEP included a provision for Minnesota Power to use approved funds to offset costs for one fleet customer.¹⁰ Minnesota Power states in this TEP that “the fleet portion of the make ready pilot was ultimately removed from the proposal due to lack of stakeholder support.”¹¹ Although the Department of Commerce did not support the commercial fleets portion of the pilot, these concerns were not based on the value of the program, but rather were based on the relevance of the commercial fleets portion to the main goals of the pilot, which were to improve access to EV charging for residents of multifamily buildings.¹² The CEGs noted these concerns, but felt that there was significant value in including a fleet in this program. The CEGs ultimately recommended that if the Commission should decide not to approve that portion of the pilot that Minnesota Power should propose the make-ready pilot for fleets in this TEP. The CEGs reiterate this position and recommend that the Commission **direct Minnesota Power to file a make-ready pilot for fleets as a supplemental filing to this TEP.** The CEGs believe that further support for fleet electrification could jumpstart transportation electrification for Minnesota Power’s largest customer segment.

III. Residential EV Programming

The CEGs note that EVs remain a relatively small portion of vehicles in Minnesota Power’s territory.¹³ With this in mind, rebates to encourage the purchase of electric vehicles are a welcome addition to Minnesota Power’s ECO portfolio. These rebates come at a critical time after EV sales saw a dip in the fourth quarter of 2025 following the repeal of tax credits at the end of September 2025.¹⁴

⁹ Docket No. E015/M-25-140. [Minnesota Power’s Transportation Electrification Plan](#) (November 3, 2025). Page 15.

¹⁰ Docket No. E015/M-25-140. [Minnesota Power’s Transportation Electrification Plan](#) (November 3, 2025). Page 16.

¹¹ *Ibid.*

¹² Docket No. [E/015/M-23-258 Initial Comments of the Department of Commerce](#) (April 1, 2025). Page 5.

¹³ See [Minnesota PUC Electric Vehicles Page](#)

¹⁴ See reporting from [Cox Auto](#)

Minnesota Power's EV rate currently provides 64 customers with the benefits of low off-peak pricing for fueling their EVs, but the requirement for installing a second meter likely has slowed adoption of the rate, leading to more unmanaged charging on Minnesota Power's system.¹⁵ The CEGs are supportive of continuing this rate, and appreciate Minnesota Power's commitment to offering this rate for residents of multifamily buildings as well. Current plans to transition all residential customers to whole-home TOU rates are welcome and should improve the economics of charging EVs off-peak without requiring the installation of a second service meter.

As Minnesota Power notes in its TEP, many EV customers currently charge EVs under the dual fuel heating rate. However, this rate also requires a separate service meter. The CEGs encourage Minnesota Power to develop a program offering that allows for the grid optimizing benefits of the dual fuel rate to be achieved without requiring the installation of a second service meter. For example, the CEGs recently supported Otter Tail Power's *EVantage* program, which could be replicated in Minnesota Power's territory to provide similar benefits.¹⁶ This program provides a modest compensation incentive to customers for participating in demand control events.

IV. Other Future Programming

In its TEP, Minnesota Power indicated interest in pursuing fleet advisory services and electric school bus rebates in its forthcoming ECO Triennial process.¹⁷ The CEGs support these initiatives, and encourage Minnesota Power to consider filing rebates for electric school buses as an ECO Modification to the current triennial to align rebates with forthcoming Environmental Protection Agency Clean School Bus grants.¹⁸ Waiting until the next Triennial to offer rebates for electric school buses would be a missed opportunity to combine these sources of funding. In the next ECO Triennial, the CEGs also recommend that Minnesota Power creates a rebate for electric transit buses.

In addition to the recommendations above pertaining to ECO, make-ready for commercial fleets, and the development of a new residential load control rate for EVs, the CEGs also encourage Minnesota Power to explore future pilot programs to fill gaps and provide access to electric transportation options for more customers. In particular, the CEGs note that electric carshare has been a successful program in Xcel's service territory, offering significant benefits particularly to historically underserved groups. Pursuing a similar program in Minnesota Power's territory would ensure that transportation electrification benefits more customers, not just those who can afford a personal vehicle.

¹⁵ Docket No. E015/M-25-140. [Minnesota Power's Transportation Electrification Plan](#) (November 3, 2025). Page 12.

¹⁶ Docket No. E/017/M-23-380. [CEG Comments on Otter Tail Power's EVantage Program](#) (November 18, 2025).

¹⁷ Docket No. E015/M-25-140. [Minnesota Power's Transportation Electrification Plan](#) (November 3, 2025). Page 23.

¹⁸ See [US EPA Request for Information](#) on forthcoming Clean School Bus Grants (February 20, 2026).

V. Conclusion

Minnesota Power's current EV offerings such as its investments in public charging, make-ready support for multifamily EV charging, and the development of EV-specific TOU rates for residential, commercial, and public charging set a foundation for successful transportation electrification. However, there are several remaining barriers. We encourage the Commission to direct Minnesota Power to address those barriers by:

- Directing Minnesota Power to propose a make-ready program for commercial fleet electrification as a supplemental filing to this TEP.
- The Commission to direct Minnesota Power to survey customers on how existing commercial offerings could be improved and increase uptake in existing programs.
- Directing Minnesota Power to develop a new demand-response residential program to support grid-optimized charging and improve the affordability of EV charging without requiring a second service meter.
- Directing Minnesota Power to include a fleet advisory services program in its ECO Triennial.
- Directing Minnesota Power to include rebates for Electric Buses, including transit buses and school buses, as a Modification to the current ECO Triennial and to include in the next Triennial.
- Directing Minnesota Power to explore future pilot offerings to support affordable and equitable access to electric transportation options, including electric carshare.

The CEGs thank Minnesota Power for its clarity in this TEP and look forward to working together on developing future transportation electrification programming, including through the forthcoming ECO Triennial. We also thank the Commission for the opportunity to participate in this docket.

Sincerely,

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Appendix A: 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.¹⁹ 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.²⁰ 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.²¹

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 2050.²²

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 Duluth, located in Minnesota Power's

¹⁹ Minnesota Public Utilities Commission, Docket No. CI-17-879. [Order Making Findings and Requiring Filings](#), February 1, 2019.

²⁰ 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).

²¹ Reichmuth, David, May 2024, "[Driving on Electricity is Now Much Cleaner than Driving a Gasoline Car](#)", Union of Concerned Scientist, *The Equation*.

²² M.J. Bradley & Associates, July 2018, "[Plug-in Electric Vehicle Cost-Benefit Analysis: Minnesota](#)," (hereinafter MJB&A Analysis)

service territory.²³ 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 62 early deaths in Duluth in 2015.²⁴ 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.²⁵

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 pollutant²⁶) by 2050.²⁷

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 2050.²⁸ 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 2021.²⁹

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.³⁰

²³ Minnesota Department of Health and Minnesota Pollution Control Agency, 2022, [Life and Breath: Greater Minnesota](#).

²⁴ *Id.* at Table 1

²⁵ Moura, February 2020, “[Who Breathes the Dirtiest Air in Minnesota?](#)”

²⁶ O’Dea, Jimmy. “[Ready for Work](#)” Union of Concerned Scientists, December 2019. Page 2.

²⁷ MJB&A Analysis

²⁸ *Id.*

²⁹ Synapse Energy Economics, [EVs Are Driving Rates Down For All Customers](#), June 2024. Page 14.

³⁰ *Id.*