



Date: January 13, 2026

*Via Electronic Filing*

Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

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

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Dear Minnesota Public Utilities Commission,

Thank you for the opportunity to provide comments on Xcel Energy's Transportation Electrification plan. Electrify America, LLC ("Electrify America") respectfully submits these comments on Xcel Energy's 2025 Minnesota Transportation Electrification Plan ("TEP"). Electrify America is a national public electric vehicle ("EV") charging network operator and a customer and partner of Xcel Energy in Minnesota and other jurisdictions. Electrify America appreciates Xcel's continued engagement with EV stakeholders and supports the overall direction of the TEP, particularly the shift toward market-oriented programs that accelerate deployment while protecting ratepayers.

Electrify America offers these comments to support the Commission's review of the TEP and to recommend enhancements that can be considered through the appropriate regulatory processes. Electrify America recognizes that the TEP is not the vehicle for implementing rate changes or program modifications that require Commission approval and therefore frames all feedback as forward-looking recommendations.

### **Utility-Owned EV Infrastructure**

Electrify America strongly supports Xcel's decision to move away from utility-owned EV infrastructure and toward a model that leverages private investment supported by targeted rebates and advisory services. Xcel's experience with company-owned DCFC sites and public charging pilots demonstrates both the operational complexity and the market limitations of utility ownership in this space (TEP p. 14; pp. 36–37).

Electrify America agrees with Xcel that utility-owned charging should remain limited and targeted to clearly defined market gaps, particularly where private investment is unlikely or lagging. Maintaining guardrails around utility ownership helps preserve

competitive neutrality, encourages innovation, and protects ratepayers from assuming unnecessary long-term operational risk, while providing an avenue to ensure communities in more challenging investment environments don't fall behind in access to charging infrastructure. Electrify America encourages Xcel to continue this policy direction and to avoid expanding utility ownership of public charging infrastructure beyond narrow, well-justified circumstances.

### **Commercial EV Infrastructure Rebate and Advisory Program**

Electrify America commends Xcel's proposal to transition away from utility-owned EVSI pilots and toward the Commercial EV Infrastructure Rebate and Advisory Program as the permanent successor for commercial, multifamily, fleet, and public charging installations. Xcel appropriately concludes that prior turnkey EVSI pilots did not effectively attract large national public charging developers and that a more flexible, rebate-based model is better aligned with market realities (TEP pp. 36–38, 54–55) based on experiences in Minnesota and Colorado. Electrify America agrees with this assessment and views the rebate structure advisory services as meaningful improvements to the EV customer experience. Electrify America also supports Xcel's use of location-based equity multipliers and higher rebate tiers for projects in environmental justice communities and areas disproportionately impacted by transportation pollution (TEP p. 56).

Electrify America supports Xcel's decision to recover program costs through the ECO framework rather than base rates, which provide downward rate pressure for Minnesota customers. (TEP p. 55). The flat, per-port rebate design and the ability to stack incentives with other state and federal funding sources, including NEVI, are particularly important for reducing capital risk for public DC fast charging ("DCFC") projects. Electrify America agrees with Xcel's conclusion that NEVI funding alone will not deliver the full range of public charging needed across communities (TEP pp. 33, 36). For these reasons, Electrify America recommends that Xcel prioritize public DCFC charging infrastructure and allocate 25% more funding towards the public DCFC charging segment where possible. In comparison, Xcel's Colorado experience demonstrates that larger-scale, well-funded rebate programs can materially accelerate deployment while reducing cost per port (TEP pp. 38–40). Electrify America encourages Xcel to consider increasing the program budget in future filings to better align investment levels with the magnitude of the infrastructure gap identified in the TEP.

Minnesota was awarded \$68 million in NEVI funding to invest in public fast charging infrastructure. Only \$10.8 million has been allocated across 24 charging sites, 10 sites are in Xcel's service territory. \$44.7 million has been allocated for Commercial EV



Infrastructure rebates with an average funding level of \$11.2 million over 4 years. A table of recommended rebate funding levels are below.

Table 1. Recommended Rebate Funding Amounts

Charging Type	Recommended Rebate per Port
<b>Commercial Level 2 (EVSE Rebate)</b>	\$2,500
<b>Multifamily Income Qualified</b>	\$8,500
<b>Public DCFC (150-249kW)</b>	\$25,000
<b>Public DCFC (250-349kW)</b>	\$32,500
<b>Public DCFC (350kW+)</b>	\$40,000

*\*Note: Peak DC delivery power per charger represented in table above, average power per port when all chargers or ports are utilized may be lower*

### **Public Charging Pilot Tariff and Future Rate Design Considerations**

Electrify America acknowledges that rate design changes, including demand charge reform, are outside the scope of the TEP and must be addressed through future rate proceedings. To this end, Electrify America recommends that Xcel proactively bring forward an optional DCFC-specific rate in its next general rate case or other appropriate filing. This recommendation is particularly important in light of the planned sunset of DCFC pilot rate structures and the risk that public fast charging sites could revert to tariffs that are not well-suited to their load profiles.

Additionally, Electrify America recommends that Xcel Energy utilize a totalized metering structure for DCFC charging stations. For larger charger installations, co-located chargers may have to be spread across multiple services due to utility service or transformer constraints. By aggregating multiple co-located services of chargers behind a single bill, totalized metering improves operational efficiency, mitigates demand charge volatility, and more closely aligns DCFC rate treatment with actual system cost causation.

While capital incentives are critical, long-term operational economics are equally important to sustaining public DCFC investment. Electrify America encourages Xcel to initiate stakeholder discussions and technical workshops ahead of a future rate case to explore rate designs that better align with DCFC utilization patterns, improve load factors, and support grid optimization.

## **Conclusion**

In summary, Electrify America recommends the following:

- Electrify America supports Xcel Energy’s decision to reduce utility ownership of EV charging infrastructure and recommends maintaining clear guardrails that limit utility ownership to narrowly defined market gaps, preserving competitive neutrality and protecting ratepayers.
- Electrify America supports the rebate-based program structure and ECO cost recovery but recommends increasing the overall program budget and allocating at least 25 percent more funding to public DC fast charging to better align with Xcel’s own infrastructure gap analysis and demonstrated success in Colorado.
- Electrify America recommends higher, power-tiered public DCFC rebates and improved coverage for DCFC equipment in non-EJ communities to reduce capital risk, accelerate deployment, and ensure public charging keeps pace with EV adoption across Minnesota.
- Electrify America recommends that Xcel bring forward an optional DCFC-specific rate in its next rate proceeding, incorporate totalized metering for DCFC sites, and convene stakeholder workshops to develop rate structures that better reflect site-level load characteristics and long-term grid benefits.

Electrify America remains committed to a high-quality direct current fast charging experience in Minnesota. The recommendations above align program design with equity, speed, and prudent cost control. To date, Electrify America has built a coast-to-coast network of DCFC stations across over 1000 locations and more than 4,000 individual DC fast chargers in total. Within Xcel Energy’s service territory, Electrify America operates 3 hyper fast charging stations with a total of 20 ports. Electrify America will continue to encourage interoperability and flexibility across a wide range of available charging incentives to realize a robust and ubiquitous network of charging infrastructure.

Respectfully submitted,

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