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October 1, 2021

—Via Electronic Filing—

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

RE: LETTER – REQUESTED SUPPLEMENTAL INFORMATION
ELECTRIC VEHICLE PROGRAMS AS PART OF COVID-19 RELIEF &
RECOVERY
DOCKET NO. E002/M-20-745

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this letter to the Minnesota Public Utilities Commission to provide the supplemental information requested by the Clean Energy Groups (CEGs) and Minnesota Department of Commerce (Department) in their September 20, 2021 PARTY REPLY COMMENTS in the above-referenced docket.

In our September 9, 2021 Reply Comments, we stated that a budget of at least \$0.5 to \$1 million would be appropriate to support community outreach and customer income-verification over a three-year period to support some of the modifications proposed in comments to our Electric Vehicle Purchase Rebate proposal. We anticipated this budget could also support outreach to small businesses, nonprofits, and government entities if rebate eligibility is not restricted to only residential customers. Both the CEGs and Department requested more information on this estimated budget for outreach and income-verification.

Based on the activities of Xcel Energy's operating utility in Colorado, Public Service Company, to support outreach and eligibility verification for EV programs designed specifically for income-qualified customers and higher-emissions communities, the Company estimates that a budget ranging between \$0.5 to \$1 million is required. As requested by the CEGs, Table 1 below provides a breakdown for the additional costs that are likely to stem from targeted outreach, marketing, and program eligibility verification activities.

Table 1
O&M Expenses to Support Outreach and Verification on Light-Duty EV Rebates

Type	Low Est	High Est
Internal Labor	\$111,000	\$145,000
Outreach: Local Partnerships	\$210,000	\$450,000
Marketing & Promotion	\$156,000	\$375,000
Income Qualification	\$25,000	\$35,000
Total	\$502,000	\$1,005,000

The internal labor estimates are based on the need to add incremental resources to oversee outreach and income verification partnerships, develop additional marketing and communications materials, and to provide advisory services for interested customers. The budget for outreach for local partnerships is based on the need to partner with community-focused organizations that can help spread awareness about the rebates to customers that could be eligible. Additional budget resources would also be needed for Company-directed marketing and outreach. Lastly, income verification for residential customers would encompass an additional scope of work for an external partner.

Again, these estimates are informed by Public Service Company's experience in Colorado implementing a similar light-duty rebate program focused on income-qualified residential customers and bringing on local partners, such as Energy Outreach Colorado and GRID Alternatives, to assist with program outreach and customer income verification.

Importantly, the Company is not opposed to an income-qualified light-duty EV rebate program, as cited by the CEGs in reference to the Public Service program in Colorado, nor to the concept of having more expansive income eligibility thresholds as compared to other low-income customer programs. Given the goal of helping to bring about a market transformation in the transportation sector and to help ensure widespread access to the benefits of EVs, it can be appropriate to establish less restrictive income eligibility requirements (i.e., higher income thresholds or additional qualifying criteria than typically allowed for income-qualified programs). In contrast, other customer programs offered by the Company have different goals. Importantly, having income eligibility parameters that are more flexible than the requirements for energy assistance programs requires the use of a trusted third party, as the Company is not involved in

collecting or assessing customer income information. These dynamics are the reason for the above-described costs associated with administering such a program.

It should be noted that this budget for outreach and program eligibility verification is not inclusive of other operating and maintenance expenses that would be necessary to implement and run a successful rebate program for light-duty and heavy-duty EVs, including costs associated with rebate processing and dealership partnerships and processes.

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

Sincerely,

/s/

HOLLY HINMAN
REGULATORY MANAGER

c: Service List

CERTIFICATE OF SERVICE

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

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

xx electronic filing

Docket Nos. E002/M-20-745

Dated this 1st day of October 2021

/s/

Lynnette Sweet
Regulatory Administrator

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