



**WeaveGrid**

September 20, 2021

Mr. Will Seuffert, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, MN 55101-2147

***RE: In the Matter of Xcel Energy’s Petition for Approval of Electric Vehicle Programs as part of its COVID-19 Pandemic Economic Recovery Investments  
Docket No. E-002/M-20-745***

Reply Comments from WeaveGrid

Dear Mr. Seuffert:

Weave Grid, Inc. (“WeaveGrid”) submits these reply comments in response to the Minnesota Public Utilities Commission’s (“Commission”) August 3, 2021 Fourth Notice of Extended Comment Period on Xcel Energy’s (“Xcel” or “the Company”) Petition for Approval of Electric Vehicle Programs as part of its COVID-19 Pandemic Economic Recovery Investments.

### **I. Introduction**

WeaveGrid is a managed charging-focused software company that helps utilities increase the adoption of electric vehicles (“EVs”) through greater understanding of customer charging behaviors, managed charging programs, and distribution-level optimization. Our mission is to drive rapid decarbonization at the intersection of transportation and energy.

WeaveGrid’s technology leverages utility and charging data, including the embedded vehicle telematics—data, controls, and communication systems— to transform unpredictable and disaggregated EV charging loads into a cohesive network of controllable grid resources. Our approach enables customers to participate in utility programs with any type of charger and without the need to install onboard diagnostic devices. WeaveGrid is a market leader in providing these managed charging solutions, which we are deploying in utility programs across the United States.

### **II. Summary of Recommendations**

Overall, WeaveGrid is highly supportive of the Company’s proposed programs and appreciates the thoughtful comments from other organizations in this proceeding. We recommend that:

- The Commission approve the Company’s electric vehicle rebate program proposal at \$150 million for light-duty vehicles and buses;
- The Commission approve a dedicated budget of \$10 million as part of the electric vehicle rebate program for enhanced rebates for income-qualified customers and small businesses, non-profits, and governments, as the Clean Energy Groups (“CEGs”) recommended in their August 26, 2021 comments;
- The Commission modify the Company’s proposal and remove the MSRP cap for light-duty electric vehicle rebates;
- The Commission approve the Company’s proposal for rebate cost recovery;
- The Commission approve the Company’s public electric vehicle charging proposal to increase access to charging; and
- The Company include testimony in its next rate case on the fleet electrification project, and the Commission not use the acceleration of the project as the sole basis of future recovery disapproval.

### III. Comments

WeaveGrid has reviewed the Company’s proposal, the thoughtful comments from environmental organizations, charging and EV companies, consumer advocates, unions, and government agencies, and the Company’s supplemental filings and reply comments. Our reply responds to the comments on the EV rebates and public fast charging program proposals and the fleet electrification project.

#### *EV Rebates*

Electric vehicles provide significant benefits to ratepayers, EV drivers, and the state of Minnesota, and, as the Commission found in its February 1, 2019 Order in Docket No. E999/CI-17-879 (“EV Inquiry Order”), electrification is in the public interest.<sup>1</sup> When evaluating the electric vehicle rebate program, many of the parties provided support for the Company’s proposal in some form and also recognized that the benefits are both real and potentially significant. The CEGs offered context in their initial comments about both the need for urgent action on climate change and the benefits of electric vehicles:

“After a summer of record-breaking heatwaves, droughts, and wildfires across the country – including and especially here in Minnesota – the public needs no report to tell them of the travails to come should we fail to reach our climate goals. Transportation is still the number one source of GHG emissions in Minnesota, and while some progress in reductions have been made, much more needs to happen to reach the GHG emissions reduction goalposts outlined by the IPCC. Transportation electrification is a key part of achieving rapid decarbonization.”

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<sup>1</sup> Minnesota Public Utilities Commission (“Commission”). February 1, 2019 Order Making Findings and Requiring Filings, *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure*, Docket No. E999/CI-17-879, Order Point 1.

“The successful implementation of EV programs and rate options can both accelerate transportation electrification and lower the cost of integrating renewable energy by leveraging charging load flexibility and the energy storage inherent in EV batteries. Done right, widespread transportation electrification will benefit all utility customers and Minnesota residents more broadly. MJ Bradley & Associates estimate that a mass market for **light-duty EVs consistent with meeting the state’s greenhouse gas reduction goals could provide cumulative net benefits to utility customers, EV drivers, and society at large totaling over \$30 billion.**”<sup>2</sup>

WeaveGrid agrees with the CEGs and other parties that there is a need to move quickly and that the advantages of electric vehicle adoption are significant. To help realize these benefits, WeaveGrid advocates for policies and customer programs that encourage managed charging, particularly those that also help increase EV adoption. The Company’s EV purchase rebate proposal, in our view, achieves these goals—the EV rebate programs are designed to help accelerate EV adoption while also taking into consideration the potential for leveraging charging load flexibility and the need to encourage off-peak charging.

WeaveGrid appreciates the added focus on equity that the Department of Commerce (“Department”) and the CEGs proposed in their initial comments.<sup>3</sup> There is a need and opportunity to help increase electric vehicle access for low-income customers with enhanced rebates. WeaveGrid also notes that the Company did not oppose the enhanced rebates in their reply comments. By offering an enhanced rebate, the Company can help ensure more customers access the benefits of electric vehicles, which is particularly important as low-income communities are disproportionately affected from an air quality perspective. **WeaveGrid supports an enhanced rebate of \$5,500 for new light-duty EVs and \$3,000 for used EVs with a dedicated budget totaling \$10 million, as the CEGs have proposed, for low-income customers and small businesses, non-profits, and government entities.**

That said, we respectfully disagree with the recommendation of the CEGs that rebates for other customers should come as a second phase once there is more experience with rebates and after a future stakeholder process.<sup>4</sup> While we agree that there is always a need to proceed thoughtfully, it is unclear what benefits will be derived from delaying and seeking more process. As the CEGs suggest in their comments, there is a need to move quickly, and the Company has highlighted the benefits of the EV purchase rebates while also incorporating recommendations from other stakeholders in their reply comments.

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<sup>2</sup> CEGs August 26, 2021 comments at pages 1 and 2.

<sup>3</sup> CEG August 26, 2021 comments at pages 11-13; Department August 26, 2021 comments at pages 23-24.

<sup>4</sup> CEG August 26, 2021 comments at pages 17-18.

Without the vehicle rebates for light-duty electric vehicles and buses, there will be more purchases of gasoline and diesel vehicles in Minnesota, resulting in higher greenhouse gas emissions and poorer air quality that will affect Minnesotans as long as those vehicles stay on the road. Moreover, there is already a gap between Minnesota and other states with incentives in place, which will likely increase without this program. For instance, despite having roughly the same number of electric customers in Xcel’s Minnesota and Public Service Company of Colorado’s (“PSCO” or “Xcel Colorado”) service territories, Xcel Energy’s EV counts in Colorado and Minnesota are already disparate due to Colorado’s EV incentives, and the Company projects that the gap will be even more significant over time (see Table 1).

**Table 1: EV Adoption in Xcel Energy’s Minnesota and PSCO service territories**

	EV Count in 2020	EV Forecasted Adoption in 2030
Colorado <sup>5</sup>	24,000	450,000+
Minnesota <sup>6</sup>	9,056	141,775

WeaveGrid also believes that the Department and the Office of the Attorney General (“OAG”) incorrectly assert that the proposed rebates are not cost-effective. In their initial comments, the Department and OAG point to the cost-benefit analysis study conducted by Energy + Environmental Economics (“E3”) on behalf of the Company to make their case for rejecting most of the EV rebate proposal. However, their argument is based on choosing the wrong scenario as the case for comparison for cost-effectiveness purposes. The E3 study provided a scenario where charging is unmanaged, and this type of scenario is typically regarded as “business-as-usual.” Instead of using that scenario for their analyses, the Department and the OAG used a more optimistic scenario, where charging is managed to minimize electric bills, as their case for comparison. In practice, the unmanaged scenario is far more likely without utility intervention and should be considered the case for comparison. If the Department and the OAG had used the more realistic unmanaged charging scenario, their analyses would have concluded differently—the utility rebate program scenario yields clear benefits to drivers and society (see Table 2).

**Table 2. Net Present Value of Net Benefits for All Vehicles Adopted Between 2020-2030 (\$Million)**

	Ratepayer	Participant/Driver	Society
Personal LDV- Unmanaged Charging Scenario	\$346	-\$10	\$336

<sup>5</sup> Public Service Company of Colorado 2021-2023 Transportation Electrification Plan, filed May 15, 2021 in Proceeding No. 20A-0204E. Direct Testimony of Jack W. Ihle at page 4.

<sup>6</sup> Xcel Transportation Electrification Plans, filed on June 1, 2020 and June 1, 2021 in Docket No. E999/M-17-879 at pages 8 of 2020 Plan and 10 of 2021 Plan.

Personal LDV- Constrained rebate program, managed charging	\$335	\$66	\$341
Net	-\$11	\$76	\$5M

The Company’s electric vehicle rebate proposals also appear more modest when viewed as annual values. Many utility EV proposals, to date, have been evaluated on the cumulative budget, and these numbers tend to make EV programs look more expensive compared to other customer programs, which are generally assessed based on their annual budgets. For instance, the Company’s cumulative budget for the 2021-2023 Conservation Improvement Program (“CIP”) is \$387 million,<sup>7</sup> significantly larger than the EV program budgets proposed for COVID-19 Relief and Recovery. If the EV rebate programs are looked at over their proposed timeframe, the annual budgets are sizeable. Still, they are commensurate with their impacts compared to the other customer programs, like CIP and Community Gardens, where the monthly bill impacts in 2022 are more than 1.5 and two times as much.<sup>8</sup>

While WeaveGrid agrees with CEGs and the Department that there should be an enhanced rebate for low-income customers and other deserving entities, there should also be a rebate for other customers to help encourage EV adoption while incentivizing participation in managed charging programs. WeaveGrid believes the Company’s proposal for rebates is reasonable, and the initial proposal would yield more significant benefits. **As a result, WeaveGrid recommends that the Commission approve the proposed rebates for all customers,** in addition to the dedicated program budget for enhanced rebates for low-income customers and small businesses, non-profits, and government entities.

Further, WeaveGrid supports the electrification of public transportation and the rebates for public transportation and school districts. As Metro Transit highlights in their May 24, 2021 comments, “This Docket is critical for providing COVID-19 relief and recovery in Minnesota, but also for advancing shared electrification goals.”<sup>9</sup> Metro Transit has made it clear that these rebates are needed, and it is a compelling opportunity for increasing access to transportation electrification benefits. Other state agencies have expressed their support for these rebates and the other proposed EV programs, including the Minnesota Department of Transportation, Minnesota Pollution Control Agency, and Minnesota Department of Administration, in this proceeding. WeaveGrid agrees with their positions and **recommends that the Commission approve the full amount of rebates for public transportation and school buses.** That said, WeaveGrid is not opposed to the

<sup>7</sup> Xcel Energy’s 2021-2023 Triennial Plan for its Minnesota Electric and Natural Gas Conservation Improvement Program, filed on July 1, 2020 in Docket No. E,G002/CIP-20-473 at page 4.

<sup>8</sup> Company reply comments at page 8.

<sup>9</sup> Metropolitan Council and Metro Transit May 24, 2021 comments at page 2.

Commission approving the \$30 million budget for public transportation and school districts that the Department and the Clean Energy Groups have proposed.

Still, there are ways that we believe the Company's proposal could still be improved. We appreciate the Clean Energy Groups calling attention to the costs of different vehicles<sup>10</sup> and agree that the Company's proposal is more restrictive than it should be regarding MSRP. We commend the Company for proposing a rebate program mindful of equity considerations, but we believe it is better to offer an enhanced rebate for low-income customers rather than limit and restrict other opportunities for rebates, especially given the level of EV adoption needed to achieve to meet a variety of goals. Any new EV represents an increase in EV benefits, regardless of who the buyer is and the total cost of the vehicle. Other customer programs, such as CIP, generally do not cap eligibility based on the cost of the equipment or the project. Instead, they recognize that a saved kilowatt-hour is a saved kilowatt-hour, regardless of the income of the participant, the MSRP of the thermostat, or the square footage of the home being retrofitted. Meanwhile, a \$50,000 manufacturer's suggested retail price (MSRP) cap is particularly restrictive given the number of electric pickup trucks coming to market,<sup>11</sup> which should attract customers both inside and outside the Twin Cities metropolitan area if the economics are right.

**WeaveGrid recommends that the Commission modify the Company's proposal and remove the MSRP cap.**

Finally, cost recovery is an important issue because it affects both customers and the utilities' incentives to bring forward and implement new programs. There is a need to be mindful of the impacts on customers. However, as stated previously, these budgets and customer impacts of the EV rebates programs are relatively small compared to other programs while supporting EV adoption, which creates significant benefits. Meanwhile, WeaveGrid strongly believes that cost recovery and incentives are important for utilities to develop and implement the innovative programs that we support. Minnesota has a long history of bringing to market some of the leading conservation programs in the country, and that history is partly due to the utilities having a strong performance incentive. For utilities, like the Company, to continue to be innovative with their EV programs, we believe that commissions should consider the utilities' incentives on a case-by-case basis, as the Commission discussed in the EV Inquiry Order.<sup>12</sup> Cost recovery and performance incentives can come in many forms, and WeaveGrid supports treating rebates as regulatory assets and allowing utilities to earn a return. This treatment is particularly notable for EV programs because it levels the playing field between rebates and owning and operating EV

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<sup>10</sup> CEG initial comments at page 17.

<sup>11</sup> The average price of a new gasoline-powered light truck in 2019 was \$38,000 (Department of Energy. Fact of the Week #1168. <https://www.energy.gov/eere/vehicles/articles/fotw-1168-january-11-2021-average-new-light-truck-price-2019-was-43-higher>), and many electric pickup trucks may not qualify under the \$50,000 MSRP cap.

<sup>12</sup> EV Inquiry Order, Order Point 10.

infrastructure while having a minimal impact on the net present value of the program costs.<sup>13</sup> Allowing for rebates to be treated as a regulatory asset and earn a return has precedent for EV programs in the Midwest, including Michigan, and other states that have adopted clean cars standards, including Colorado, Maryland, and New York.<sup>14</sup> **WeaveGrid supports the Company's cost recovery proposal.**

### *Public Charging*

WeaveGrid believes that public charging is a critical enabler for EV adoption and generally supports all efforts to increase access to public charging. Of states that have passed clean car standards, Minnesota ranks second to last in public charging infrastructure per capita.<sup>15</sup> However, Tesla highlighted certain considerations for the Commission, particularly that the Commission provide guidance on utility-owned public fast charging rates. We acknowledge Tesla's requests, which are generally in line with the Commission's EV Inquiry Order, and **WeaveGrid recommends that the Commission approve this program proposal while contemplating Tesla's additional considerations.**

### *Fleet Electrification*

We are excited to see the Company and other utilities aggressively pursuing goals to electrify their fleets. The Company's fleet is among the largest in the state, and adopting electric vehicles should help lower the Company's operating costs over time and provide environmental benefits as these fleet vehicles are driven in the communities that the Company serves. Greenlots and ChargePoint supported the project in their initial comments while the Department recommended the Company submit testimony on the fleet electrification in its next rate. The Company did not oppose the Department's request in their reply comments but asked the Commission that the acceleration of the projects would not be the sole basis of future recovery disapproval. While WeaveGrid supports moving this

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<sup>13</sup> Company reply comments at pages 8-9.

<sup>14</sup> Michigan Public Service Commission. July 9, 2019 Order *In the Matter of the Application of Consumers Energy Co. for Auth. to Increase its Rates for the Generation and Distribution of Elec. and for Other Relief*, Case No. U-20134, at pages 4-9.; Maryland Public Service Commission. January 14, 2019 Order No. 88997 *In the Matter of the Petition of the Electric Vehicle Work Group for Implementation of a Statewide Electric Vehicle Portfolio*, Case No. 9478, at pages 75-82.; New York Public Service Commission. July 16, 2020 *Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs*. Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure, Case No. 18-E-0138, at page 79.; Colorado Public Utilities Commission. January 11, 2021 Decision No. C21-0017, *Before the Public Utilities Commission of the State of Colorado*, Proceeding No. 20A-0204E, In the Matter of the Application of Public Service Company of Colorado for Approval of its 2021-2023 Transportation Electrification Plan. Commission Decision Granting Application with Modifications, at pages 26-27.

<sup>15</sup> The only state with a clean cars standard behind Minnesota is New Jersey on a per capita basis (Department of Energy, Fact of the Week #1169. <https://www.energy.gov/eere/vehicles/articles/fotw-1169-january-18-2021-vermont-had-highest-number-public-electric-vehicle> ). This datapoint caught the New Jersey stakeholders' attention, and, as a result, the BPU has released straw proposals and approved large transportation programs to address this gap. For instance, the BPU recently approved \$166 million in programs for PSE&G.

project forward on a faster timeline, **we are not opposed to seeing the Company submit testimony in its next rate case or the Company's request that acceleration of the projects not be the sole basis of future recovery disapproval.**

#### **IV. Conclusion**

WeaveGrid applauds the Company's effort to respond with innovative EV programs as part of COVID-19 Relief and Recovery and appreciates the thoughtful comments from others in this proceeding. The EV programs represent a unique opportunity to generate substantial economic and societal benefits for ratepayers, EV drivers, and the state while increasing access to transportation electrification benefits for all customers. We look forward to continued engagement and thank the Commission for consideration of these comments.

Respectfully submitted,  
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## CERTIFICATE OF SERVICE

I, Amanda Myers, hereby certify that on this day, the 20th of September 2021, I served Weave Grid, Inc.'s Reply Comments In the Matter of Xcel Energy's Petition for Approval of Electric Vehicle Programs as part of its COVID-19 Pandemic Economic Recovery Investments Docket No. E-002/M-20-745 on each person whose name appears on the Official Service List for E002/M-20-745, as attached.

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

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