ALLIANCE FOR AUTOMOTIVE INNOVATION

February 24, 2026

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

Re: Alliance for Automotive Innovation's Reply Comments for Xcel's 2025 Transportation Electrification Plan

The Alliance for Automotive Innovation (Auto Innovators) represents the full auto industry value chain, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving $1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector.[1]

I. Increase the program budget by 25% to accelerate EV infrastructure deployment.

Minnesota will need 48,000 public level 2 ports and 4,000 direct current fast chargers (DCFCs) by 2030 to support approximately 717,000 EVs.[2] Currently, Xcel's territory only has 490 DCFCs and 11,584 level 2 ports, well short of the deployment pace needed to reach the 2030 infrastructure target.[3] Public charging infrastructure will need to increase approximately 4-fold in four years, which will be difficult to achieve without incentives given the current stage of the market.

Plug-In America's (PIA) 2025 Driver Survey shows that nearly 36 percent of respondents were concerned about charger availability when purchasing an EV.[4] Our members hear these concerns directly from prospective EV consumers. Lack of available and reliable charging infrastructure is well understood to massively inhibit EV deployment.

Utility incentives have been effective catalysts for EV infrastructure build out. We strongly support Xcel's continued focus on incentivizing charging deployment and would encourage the Public Utilities Commission (Commission) to require Xcel to increase the program budget by at least 25 percent to better reflect the infrastructure needed to support the expected 2030 EV adoption rate. In addition to scale, the success of this program will depend on delivering a reliable and convenient charging experience that builds long-term consumer confidence.

---

[1] **Alliance for Automotive Innovation.** (n.d.). *Resources and insights*. https://www.autosinnovate.org/resources/insights
[2] Minnesota Department of Transportation. (2025, July). *Minnesota electric vehicle infrastructure needs assessment (EVINA)* (Report No. 38917250-v1). https://mdl.mndot.gov/items/m17837.
[3] Xcel Energy. (2025). 2025 Transportation Electrification Plan (Docket No. E002/M-25-142). Minnesota Public Utilities Commission. Page 34.
[4] Plug In America. (2025). *EV Driver Survey*. Retrieved from https://pluginamerica.org/wp-content/uploads/2025/06/2025-EV-Driver-Annual-Survey-Report-1.pdf. Page 12.

Furthermore, Xcel currently requires program applicants to first receive an approval letter before beginning EVSE project construction. This requirement creates an arbitrary bottleneck to infrastructure deployment, exacerbating the state's EV charging shortfall. Therefore, we encourage the Commission to require Xcel to allow applicants to begin project construction, at their own risk, after a specified date the incentive program application window opens. This will save time and resources coordinating approvals timelines and enable Xcel to expedite infrastructure deployment in support of the state's goals.

II. Require Xcel to propose a new DCFC commercial tariff in its next rate case.

High and unpredictable electricity costs, especially due to demand charges, can discourage DCFC deployment The cost of electricity represents a significant portion of a DCFC's operational budget, especially if they are high-powered (e.g. 150 kW or more).[5] Commercial rates commonly used by utilities today were not designed for DCFC load profiles–short bursts of high electricity demand on the grid–and therefore can lead to high costs for operators due to demand charges. This cost represents a major barrier to DCFC deployment. Therefore, we encourage the Commission to require Xcel to develop a new optional DCFC commercial tariff for its next rate case that mitigates this financial impact. Xcel has models from utilities across the country to rely on, such as its volumetric "S-EV" rate in Colorado or the New York investor-owned utilities' EV Phase-In Rates that reduce demand charges for DCFC customers with load factors up to 24%.[6]

Auto Innovators appreciates the opportunity to comment on Xcel's Transportation Electrification Plan and looks forward to ongoing collaboration with the Commission to help the state achieve its EV and EV infrastructure deployment goals.

Respectfully submitted,

Cory Bullis
Director, Energy & Environment Policy
Alliance for Automotive Innovation

[5] National Renewable Energy Laboratory, Innovative Charging Solutions for Deploying the National Charging Network: Techno-Economic Analysis, NREL/TP-91021 (Golden, CO: National Renewable Energy Laboratory, 2024), at 4, https://doi.org/10.2172/1988020.
[6] Alternatives to Traditional Demand-Based Rate Structures for Commercial EV Charging, Case 22-E-0236, at 32 (Jan. 19, 2023).