

November 3, 2022

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

—Via Electronic Filing—

RE: REPLY COMMENTS  
ELECTRIC VEHICLE PILOT PROGRAMS MODIFICATION REQUEST  
DOCKET NO. E002/M-18-643

Dear Mr. Seuffert,

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the October 18, 2022 Comments from ChargePoint and the October 24, 2022 Comments from the Minnesota Department of Commerce, Division of Energy Resources (Department) in the above-referenced docket. These Comments were submitted in response to our request to modify our Fleet Electric Vehicle Service Pilot and Public Charging Infrastructure Pilot filed on September 23, 2022.

In our September 23, 2022 petition we requested Minnesota Public Utilities Commission (Commission) approval to continue operating both pilots beyond the end of this year and approval to reallocate budgeted funds between the two pilots. Several Companies provided letters of support for these pilots and our efforts to promote fleet and public charging, which we included with our Petition in Docket No. E002/M-22-432.<sup>1</sup> Our requested modifications would allow us to continue to operate these pilots without interruption and provide additional operational budget flexibility, ensuring we can continue our fleet and public charging efforts.

We thank both ChargePoint and the Department for their review of our modification request and their recommendations that our request should be approved. In these Reply Comments we will address the specific recommendations of the Department and provide the additional information they requested in their Comments.

---

<sup>1</sup> See *Attachments AA1 through AA11*

## **Pilot Terms**

In our modification request, we requested that the terms of the pilots be extended beyond their original three-year terms until there is final resolution of our program modification request in Docket No. E002/M-22-432. Our extension request was to allow for continued operations if the case takes longer to consider than expected. The Commission recently issued an order to move our larger EV proposal to a contested case.<sup>2</sup> While the procedural schedule for the contested case has not been established yet, we believe the Department's recommendation to add one year to the pilot terms, extending them into 2024, will be sufficient in allowing us to operate the pilots until the larger modification requests are decided.

## **Budget for Fleet EV Service Pilot Projects**

The Company has requested flexibility to move planned budget funds between the Fleet EV Service Pilot and Public Charging Infrastructure Pilots. We have nearly exhausted the originally approved budget for the Public Charging Infrastructure Pilot of \$9.2 million. Meanwhile, for the Fleet EV Service Pilot we expect to have spent about \$1.5 million of the approved budget of \$14.4 million by the end of this year.

This Department has requested greater information about the required budget needed to serve the applications received for the Fleet EV Service Pilot. The Company has not previously provided this information (and the Public Charging Infrastructure Pilot as well) because most the applications are still at the point where costs for the proposed projects are not known as design work has not yet been completed. The Company has consistently provided the information it has available in our previous filings and EV Annual Reports. However, to ensure that Commission has all the information it needs to decide in this request, we are providing estimates of the costs of future Fleet EV Service Pilots acknowledging the fact that costs may differ once actual design work is completed for all projects.

If our modification request is approved, we plan to continue accepting applications for both pilots and will allocate funds between the two pilots to service the applications that are approved until the full budgets for both pilots are exhausted. As such, we can confirm that we are planning to have budgeted funds available to serve the 11 applications that were in process at the time we filed our September 23, 2022 Petition, as was recommended by the Department, plus any additional applications that are accepted while funding is still available. After our petition, we received an additional

---

<sup>2</sup> See NOTICE OF AND ORDER FOR HEARING, Docket No. E002/M-22-432 (October 26, 2022)

four applications and currently have 15 applications in process for the Fleet EV Service Pilot.<sup>3</sup> We expect to have funds for all these projects.

We have not completed detailed cost estimates for all the Fleet EV Service Pilot applications currently in process. However, based on previous experiences and currently available information, we estimate that approximately \$2.1 million of funds will be needed to complete the 15 projects currently in the application phase and operate all completed stations. This information was requested by the Department in their Comments.

We appreciate the opportunity to provide the Commission with our Reply Comments and ask that they approve our request as filed in our September 23, 2022 petition. We have electronically filed this document with the Commission and notice of the filing has been served on the parties on the attached service list. Please contact Carl Cronin at [carl.cronin@xcelenergy.com](mailto:carl.cronin@xcelenergy.com) if you have any questions regarding this filing.

SINCERELY,

/s/

HOLLY HINMAN  
DIRECTOR, REGULATORY AFFAIRS

c: Service List

---

<sup>3</sup> 8 projects with signed agreements in design/construction phase and 7 applications in processing phase.

## CERTIFICATE OF SERVICE

I, Joshua DePauw, 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 NO. E002/M-18-643**

Dated this 3rd day of November 2022

/s/

---

Joshua DePauw

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_18-643_Official 18-643
Thomas	Ashley	tom@greenlots.com	Greenlots	N/A	Electronic Service	No	OFF_SL_18-643_Official 18-643
Kevin	Auerbacher	kauerbacher@tesla.com	Tesla, Inc.	1050 K Street NW, Suite 101  Washington, DC 20001	Electronic Service	No	OFF_SL_18-643_Official 18-643
Anjali	Bains	bains@fresh-energy.org	Fresh Energy	408 Saint Peter Ste 220  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-643_Official 18-643
Max	Baumhefner	MBAUMHEFNER@NRDC.ORG	Natural Resources Defense Council	111 Sutter St 21st Fl  San Francisco, CA 94104	Electronic Service	No	OFF_SL_18-643_Official 18-643
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325  Washington, DC 20036	Electronic Service	No	OFF_SL_18-643_Official 18-643
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-643_Official 18-643
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_18-643_Official 18-643
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_18-643_Official 18-643
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-643_Official 18-643

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-643_Official 18-643
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-643_Official 18-643
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_18-643_Official 18-643
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St  St Paul, MN 55106	Electronic Service	No	OFF_SL_18-643_Official 18-643
John	Farrell	jfarrell@ilsr.org	Institute for Local Self- Reliance	2720 E. 22nd St Institute for Local Self- Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_18-643_Official 18-643
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-643_Official 18-643
Lucas	Franco	lfranco@liunagroc.com	LIUNA	81 Little Canada Rd E  Little Canada, MN 55117	Electronic Service	No	OFF_SL_18-643_Official 18-643
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_18-643_Official 18-643
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-643_Official 18-643

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joe	Halso	joe.halso@sierraclub.org	Sierra Club	1536 Wynkoop St Ste 200  Denver, CO 80202	Electronic Service	No	OFF_SL_18-643_Official 18-643
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-643_Official 18-643
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_18-643_Official 18-643
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_18-643_Official 18-643
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-643_Official 18-643
Samantha	Houston	shouston@ucsusa.org	Union of Concerned Scientists	1825 K St. NW Ste 800  Washington, DC 20006	Electronic Service	No	OFF_SL_18-643_Official 18-643
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_18-643_Official 18-643
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Philip	Jones	phil@philjonesconsulting.com	Alliance for Transportation Electrification	1402 3rd Ave Ste 1315  Seattle, WA 98101	Electronic Service	No	OFF_SL_18-643_Official 18-643

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brendan	Jordan	bjordan@gpisd.net	Great Plains Institute & Bioeconomy Coalition of MN	2801 21st Ave S Ste 220 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_18-643_Official 18-643
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_18-643_Official 18-643
Samuel B.	Ketchum	sketchum@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Chris	King	chris_king@siemens.com	Siemens	4000 E. Third Ave Suite 400 Foster City, California 94404	Electronic Service	No	OFF_SL_18-643_Official 18-643
Frank	Kohlasch	frank.kohlasch@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd N. St. Paul, MN 55155	Electronic Service	No	OFF_SL_18-643_Official 18-643
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-643_Official 18-643
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Nicole	Lepre	info@atlaspolicy.com	Atlas Public Policy	515 Q Street NW Unit 2 Washington, DC 20001	Electronic Service	No	OFF_SL_18-643_Official 18-643



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-643_Official 18-643
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-643_Official 18-643
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_18-643_Official 18-643
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_18-643_Official 18-643
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-643_Official 18-643
Kevin	Miller	kevin.miller@chargepoint.com	ChargePoint, Inc.	254 E. Hacienda Avenue  Campbell, California 95008	Electronic Service	No	OFF_SL_18-643_Official 18-643
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-643_Official 18-643
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-643_Official 18-643

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-643_Official 18-643
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_18-643_Official 18-643
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_18-643_Official 18-643
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_18-643_Official 18-643
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-643_Official 18-643
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-643_Official 18-643
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_18-643_Official 18-643
Alice	RobertsDavis	admin.info@state.mn.us	Department of Administration	15 Sherburne Avenue St. Paul, MN 55155	Electronic Service	No	OFF_SL_18-643_Official 18-643
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-643_Official 18-643
Kevin	Schlangen	kevin.schlangen@co.dakota.mn.us	Dakota County	2800 160th Street West Rosemount, MN 55068	Electronic Service	No	OFF_SL_18-643_Official 18-643

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-643_Official 18-643
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-643_Official 18-643
Timothy	Sexton	Timothy.Sexton@state.mn.us	Minnesota Department of Transportation	395 John Ireland Blvd St. Paul, MN 55155-1899	Electronic Service	No	OFF_SL_18-643_Official 18-643
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave Campbell, CA 95008	Electronic Service	No	OFF_SL_18-643_Official 18-643
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-643_Official 18-643
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-643_Official 18-643
Dean	Taylor	dtaylor@pluginamerica.org	Plug In America	6380 Wilshire Blvd, Suite 1000 Los Angeles, CA 90048	Electronic Service	No	OFF_SL_18-643_Official 18-643
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-643_Official 18-643

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue  Duluth, MN 55807	Paper Service	No	OFF_SL_18-643_Official 18-643
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-643_Official 18-643
Francesca	Wahl	fwahl@tesla.com	Tesla	3500 Deer Creek Rd  Palo Alto, CA 94304	Electronic Service	No	OFF_SL_18-643_Official 18-643
Darrell	Washington	darrell.washington@state.mn.us	DOT	N/A	Electronic Service	No	OFF_SL_18-643_Official 18-643
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_18-643_Official 18-643
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-643_Official 18-643