



January 13, 2026

Sasha Bergman, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**RE: In the Matter of Xcel Energy’s Transportation Electrification Plan
PUC Docket No. E002/M-25-142**

Dear Ms. Bergman:

Weave Grid, Inc. (“WeaveGrid”) submits these comments to the Minnesota Public Utilities Commission (“the Commission”) in response to the Transportation Electrification Plan (“TEP”) proposals of Northern States Power Company, d/b/a Xcel Energy (“the Company”), related to managed charging, including the Company’s proposed Charging Perks program and its broader managed charging and rate-based strategy.

I. INTRODUCTION

WeaveGrid is a software company that helps utilities increase adoption of electric vehicles (“EVs”) through a greater understanding of customer charging behaviors, managed charging programs, and distribution-level optimization. WeaveGrid’s technology leverages utility and device data—including embedded vehicle telematics and charging equipment data and controls, as well as other customer-sited load flexibility—to transform disaggregated customer load into a cohesive network of controllable grid resources. We work with utilities across the country, including supporting elements of the Company’s managed charging programs.

We appreciate the Company’s continued leadership and thoughtful evolution of its EV portfolio. In particular, WeaveGrid supports the Company’s efforts to pair rates with active managed charging capabilities that can deliver both bulk-system and distribution-system value as EV adoption increases. For the reasons discussed below, WeaveGrid supports Commission approval of the Company’s 2025 TEP proposals discussed in these comments.

II. COMMENTS

WeaveGrid’s comments focus on the need for a practical, scalable managed charging portfolio that: (i) supports affordability for customers; (ii) helps reduce costs-to-serve EV load; and (iii) addresses the distribution-level impacts of EV charging as adoption grows.

A. Role of Time-of-Use and Time-of-Day rates for electric vehicles

WeaveGrid supports the Company's efforts to expand time-varying rate options, including whole-home Time-of-Use ("TOU") and Time-of-Day ("TOD") offerings. As the Company notes, time-varying rates provide an important, scalable pathway for customers to reduce charging costs by shifting energy usage to lower-cost periods, and can also shape overall residential load, not just EV charging.

At the same time, the Commission should view TOU/TOD as an important foundation, but not a panacea, especially as charging becomes larger and increasingly automated. A known operational risk is that customers and devices can synchronize charging at the start of an off-peak period, creating secondary peaks ("timer peaks") that may shift load in time without fully mitigating localized distribution constraints.¹ This dynamic is a key reason why active managed charging becomes increasingly important as EV adoption grows. Active managed charging can preserve the broad benefits of time-varying rates while reducing synchronization and enabling more precise optimization, where grid value is greatest.

B. Active managed charging: Support for Charging Perks

WeaveGrid supports approval of Charging Perks. We agree with the Company that there is less incremental value when managed charging is limited to looking only at traditional system peaks. EV charging creates a different and increasingly important planning challenge. Significant EV load can be noncoincident with system peaks and still drive transformer and feeder constraints that increase costs for all customers.

In practice, EVs are a "bottom-up" problem. Solutions need to be designed to avoid unnecessary transformer and feeder upgrades by improving asset utilization and managing local constraints. We therefore strongly support the Company's proposal to pursue more sophisticated optimization, particularly approaches that are capable of delivering distribution-level benefits in addition to bulk system benefits. Programs that can target constrained areas and manage charging to mitigate feeder and transformer peaks are more likely to be durable and scalable as EV adoption continues to grow.

C. Passive managed charging and Optimize-Your-Charge

We understand why the Company proposes to transition away from Optimize-Your-Charge ("OYC") in this particular context, especially as whole-home TOU becomes available and the Company seeks to prioritize a portfolio where TOU provides a broad pathway and Charging Perks provides more granular, operationally useful capabilities.

However, WeaveGrid respectfully urges the Commission not to treat the proposed closure of OYC as a general precedent that passive managed charging programs are inherently lower

¹ Weave Grid, Inc., Comments, In the Matter of Xcel Energy's 2021 Integrated Distribution System Plan & Request for Certification of Distributed Intelligence & the Resilient Minneapolis Project, Docket No. E002/M-21-694 (Minn. Pub. Utils. Comm'n Feb. 25, 2022).

value or should be routinely retired. Passive managed charging programs have a clear and important use case, particularly in jurisdictions or utility service territories where a whole-home time-varying rate option is not available (or not yet broadly accessible). In those contexts, passive managed charging can capture material time-of-day savings, effectively approximating the benefits of time-varying pricing, while providing bulk-system benefits at scale, especially when enrollment friction is low.

The relative value of a passive program depends heavily on the availability and design of time-varying rates. When time-varying rates are not present, a well-designed passive managed charging program can be a practical tool to drive off-peak charging behavior. When time-varying rates are present and broadly accessible, a passive program may become more redundant unless it delivers incremental value through targeted outreach, differentiated behavioral design, or other measurable elements.

WeaveGrid supports the Company's proposed transition approach for existing OYC participants, and encourages the Commission to view this portfolio shift as a fact-specific outcome tied to Xcel Energy's evolving rate options and the Company's program design.

D. Customer pathways and eligibility

As the Company expands both rate and programmatic tools, it is important to ensure customers can participate. This is especially salient in managed charging, where interoperability and OEM-authorized control pathways continue to mature across the market.

Customer pathways. We appreciate the Company's recognition that active managed charging depends on OEM-authorized pathways and device compatibility, and that these capabilities vary across vehicle platforms today. Importantly, increasing numbers of automakers are enabling authorized approaches for managed charging, and the direction of the market is encouraging. This reality makes it especially important that the Company maintains multiple "on-ramps" for customers to participate in beneficial charging behavior, most notably through time-varying rate options for broad access, alongside Charging Perks for customers who can participate through authorized pathways.

We also want to recognize the Company's track record to date in advancing OEM-authorized pathways. Xcel Energy has appropriately prioritized data integrity and operational reliability by working through authorized integrations. Maintaining this approach will remain important as the managed charging market expands and as the Company scales participation across a wider range of customers and vehicle platforms. We encourage the Company to maintain this position.

Customer education and marketing. We also encourage continued attention to advisory services, education, and marketing, and recognize the importance of timing and targeting to support cost-effectiveness. In WeaveGrid's experience, education is most effective when tied

to “moments that matter,” such as EV purchase/lease, charger installation, and rate selection. These moments are when customers are most receptive, and when outreach can most efficiently increase enrollment and improve charging outcomes.

Commercial managed charging. Finally, we agree with the Company’s measured approach to commercial managed charging at this time. Commercial and fleet charging can present significant opportunities over time, but it can also be more site-specific and operationally complex. It is reasonable for the Company to continue analyzing commercial managed charging opportunities and propose offerings when use cases mature, participation pathways are clear, and the value proposition is demonstrable.

III. RECOMMENDATIONS

We respectfully recommend that the Commission:

- **Approve the Company’s 2025 TEP proposals addressed in these comments**, including the managed charging and rate elements that support affordable, reliable transportation electrification;
- **Approve Charging Perks**, including the Company’s planned approach to deliver both bulk-system and distribution-level benefits;
- **Continue supporting time-varying rate pathways** as a scalable foundation for shaping residential load and managing EV charging costs, while recognizing that time-varying rates alone are not a complete solution as EV adoption scales and charging becomes more automated, including the potential for secondary peaks; and
- **Encourage continued development of distribution-optimized managed charging strategies** that improve asset utilization and reduce the likelihood of unnecessary transformer and feeder upgrades.

IV. CONCLUSION

WeaveGrid appreciates the ongoing dialogue on transportation electrification in Minnesota. We look forward to continued engagement and thank the Commission for consideration of these comments.

Respectfully submitted,

WEAVE GRID, INC.

Sincerely,

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