



January 13, 2026

**RE: In the Matter of Xcel Energy's 2025 Transportation Electrification Plan
Docket No. E002 /M-25-142**

Initial Comments of Native Sun Community Power Development

Introduction

Native Sun Community Power Development (Native Sun) is a Native-led nonprofit organization focused on energy sovereignty, climate resilience, and sustainable community development. Founded to empower Native communities across the Upper Midwest, Native Sun integrates electric transportation, renewable energy projects, workforce training, and educational programs to promote self-determination and economic independence.

We would like to thank the Commission for the opportunity to participate in this docket and look forward to working with the Commission, Xcel Energy, and other stakeholders to improve the proposal to further support transportation electrification efforts in Xcel Energy's Minnesota service territory.

Recommendations for Xcel Energy's Transportation Electrification Plan

1. Native Sun Community Power Development recommends that the Commission approve the proposed TEP with the recommended proposed modifications by the Clean Energy Groups (CEGs: Fresh Energy, Union of Concerned Scientists, Sierra Club, Environmental Law and Policy Center, and Plug In America). Native Sun has spoken with Fresh Energy and reviewed their comments on the TEP being submitted to the Commission on behalf of the CEGs—we concur with these proposed modifications.

[To the question, "are there gaps in Xcel Energy's transportation electrification programs the Commission should address to ensure equitable customer outcomes?"]

2. We recommend that Xcel Energy work with our organization to help improve the Residential Advisory Services and Guided Charging Installation program by using Native Sun's capacity to do direct outreach on EVs and EV infrastructure for Tribal communities in Minnesota. At Native Sun Community Power Development, we know that Tribal communities are just as interested in accessing EVs and their benefits as anyone else. A key in addressing this interest is to "meet people where they are" by bringing EVs and



EV technology demonstrations and related conversations directly into these communities. Trusted partners like Native Sun can help Xcel Energy improve its education and outreach programs for underserved populations by helping make more of a direct connection to people who live on Tribal lands and in Tribal communities.

Background on Native Sun Community Power Development's Electric Vehicle and Infrastructure Work for Tribal Communities

Native Sun Community Power Development has helped deploy EVs and EV chargers for 9 Tribal Nations in Minnesota, North Dakota, South Dakota, and Michigan (with technical assistance for an additional 10 Tribes in the Upper Midwest). This infrastructure improves travel reliability in rural areas, strengthens intertribal and regional connectivity, and reduces transportation barriers for workforce participation, enterprise operations, and tourism. By placing charging infrastructure in visible, accessible locations, we have helped enable Tribal communities to capture economic activity associated with increased electric vehicle travel while reducing reliance on fossil fuels and supporting long-term community and economic resilience.

At Native Sun, we are working with Tribal Nations to benefit from electrifying a diverse array of transportation options. As an example, we have helped the Red Lake Nation in Minnesota obtain:

- Electric vans for important health and counseling services
- Electric medium duty box-trucks for locally grown produce and buffalo transport
- Electric pickups and side-by-side vehicles for agricultural operations
- Charging infrastructure that supports both fleet and public EV usage

Further, we are exploring plans to help Red Lake Nation deploy renewable energy in combination with electric farm vehicle equipment agriculture to help pilot an agrovoltaic operation. Efforts like these are showing that Tribal leadership can help accelerate the transition to EVs in rural and remote areas, and highlight the value of uplifting underserved communities through access to clean transportation technologies.

To highlight these efforts, the figure below demonstrates just part of the need to invest in electric transportation infrastructure on Tribal lands.

Minnesota Tribal Lands Superuser Concentration

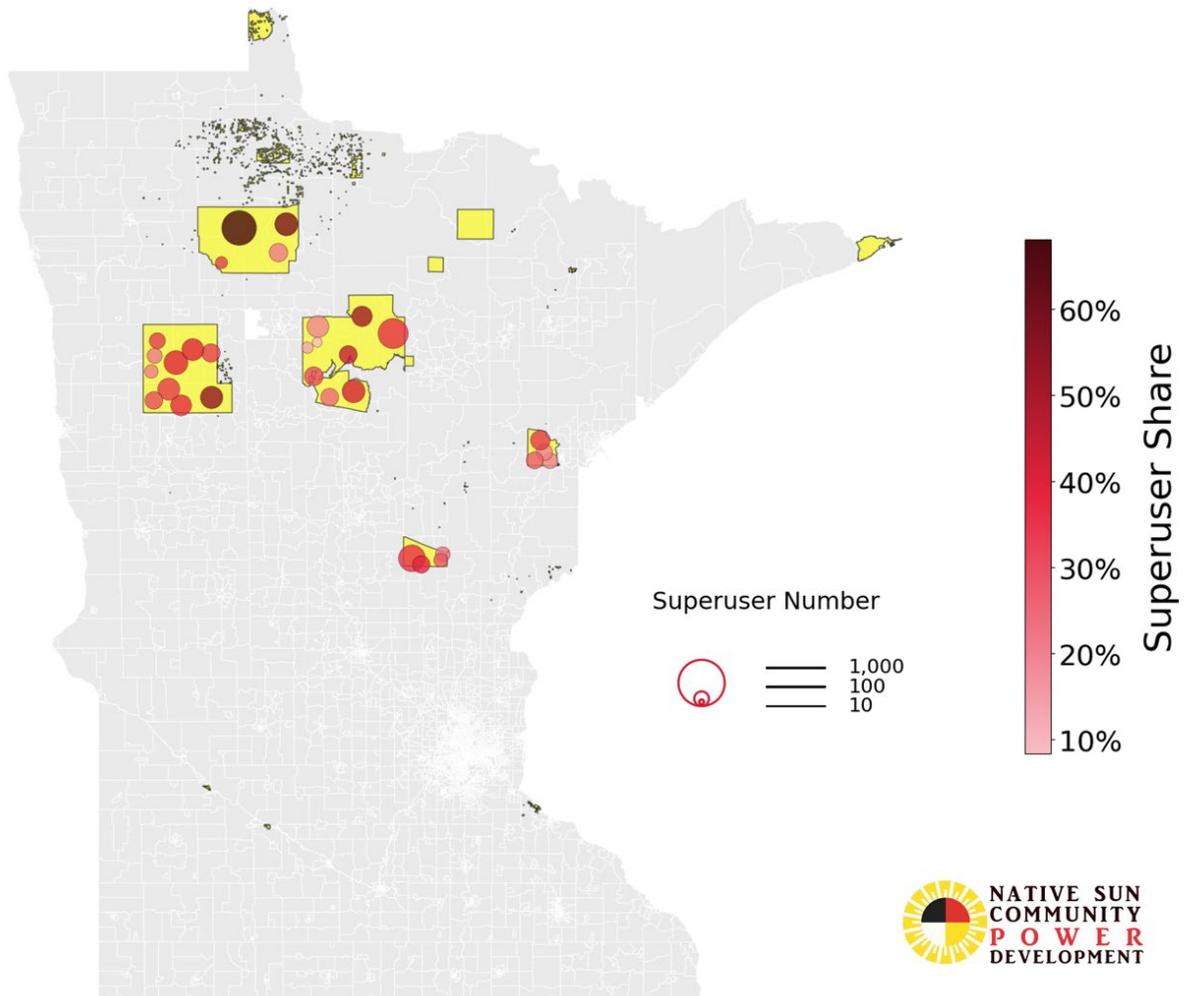


Figure 1: The map above shows the concentration of gasoline “superusers” on Minnesota Tribal lands. Superusers are the top 10% of US drivers in terms of gasoline use. Tribal Nations have a disproportionate number of superusers compared to the general population, despite having a disproportionately lower average household income compared to the general population. Because of this, transitioning to affordable electric vehicle access can represent a significant cost savings for people living on Tribal lands in Minnesota.

Conclusion

We again thank the Commission for considering our recommendations for this docket. Native Sun Community Power Development stands ready to assist the Commission and Xcel Energy in making sure that the Tribal Nations of Minnesota have access to affordable, clean



transportation options, and that Tribal innovation helps all Minnesotans transition to the benefits of electric transportation.

Sincerely,

A handwritten signature in black ink that reads "Peter Chipman".

Peter Chipman
Director of Sustainable Transportation
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