

October 30, 2020

Minnesota Public Utilities Commission  
121 7th Place East #350  
St. Paul, MN 55101

Dear Commissioners:

The Metropolitan Council would like to reiterate our strong support and excitement for Docket No. E,G 999/CI-20-745 (Docket), "COVID-19 Pandemic Economic Recovery Investments", specifically Xcel Energy's "Electric Vehicle Programs". Metro Transit delivers environmentally sustainable transportation choices that link people, jobs, and communities conveniently, consistently, and safely each and every day. We strive to provide safe, high quality, and reliable service and in order to do so, Metro Transit focuses on taking strategic action.

While the Metropolitan Council does not often provide comments on Public Utility Commission (PUC) actions, we felt that with the numerous public comments directed at Xcel Energy surrounding budget and timing of this Docket that the Metropolitan Council, and Metro Transit as its operating division, are in a unique position to provide perspective regarding the significance of this opportunity.

We pride ourselves on being early adopters of new technology which positively impacts our customers and community. This is evidenced by the 2002 implementation of Hybrid Electric buses, which have 25 percent better fuel economy, operate quietly, and recharge the battery when braking. Building on this progress, in 2019, Metro Transit was the first transit system in the region to launch 60' Electric BRT buses for the METRO C Line. Innovative partnerships have further advanced electrification efforts; as seen through the Metropolitan Council and Xcel Energy Green Energy Partnership which focuses on producing and purchasing clean, renewable energy.

Metro Transit is eager to maintain the momentum gained from our 2019-2020 experience on the C Line Electric Bus Pilot and the Xcel Energy Make Ready Infrastructure Pilot. We are excited to continue exploring new technologies that will reliably meet operating needs and further advance fleet electrification for the transportation and power sectors. Metro Transit encourages the Commission to move both expeditiously and with due diligence in evaluating proposals for Docket 20-745. Economic stimulation, job promotion, and increased health and environmental benefits through electric bus programming is a shared and attainable partnership goal.

The Metropolitan Council's proposed 2021-2026 Capital Improvement Program (CIP) outlines the capital program for major local capital investments and is currently available for public comment. While the Bus Electrification program, which includes building electric bus infrastructure, remains a priority, there is no funding in the proposed 2021-2026 CIP for additional electric buses due to unfunded capital maintenance demands.

The costs to electrify include both the vehicle propulsion premium and the charging infrastructure. On average, based on our industry experience and research, one electric bus costs \$1.24 million including all associated charging infrastructure (Table 1).

**Table 1: Average cost per 40-foot electric bus with associated charging infrastructure**

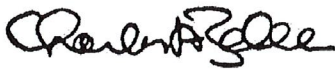
Vehicle and Charging Infrastructure	Ratio per bus*	Unit price	Quantity	Cost
40' Electric Bus		\$ 990,000	10	\$ 9,900,000
Depot Charger and installation	1 charger per 2 buses	\$ 250,000	5	\$ 1,250,000
On Route Charger and installation	1 charger per 10 buses	\$ 1,250,000	1	\$ 1,250,000
Total				\$ 12,400,000
<b>Average Cost per Electric Bus</b>				<b>\$ 1,240,000</b>

\* Ratio assumes large enough electric bus fleet to achieve economies of scale. Smaller fleets require higher charger to bus ratio, to provide redundancy and ensure reliable operations.

The PUC’s “COVID-19 Pandemic Economic Recovery Investments” effort provides an unprecedented opportunity for Metro Transit, in partnership with Xcel Energy, to continue advancing its electric bus program and maintain its commitment to cleaner propulsion. Due to capital maintenance demands and other budget constraints, all buses included in Metro Transit’s proposed 2021-2026 CIP are currently diesel propulsion. The environmental and economic recovery benefits of electrification are clear. The remaining component is a reliable funding source for bus electrification. Metro Transit is committed to fiscal responsibility and absent approval of the Docket, Metro Transit is unable to move forward with bus electrification in 2021.

As one of the country’s largest transit systems and an established leader in the transit industry, Metro Transit is committed to providing public transportation which supports the economic vitality, environmental stability, and quality of life of those in the Twin Cities region. We believe this Docket is critical for providing COVID-19 relief and recovery in Minnesota, but also for advancing shared electrification goals which would not be made possible without partnerships like this one.

Sincerely,



Charles A. Zelle  
Metropolitan Council Chair



Wes Kooistra  
Metro Transit General Manager