



January 13, 2026

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

**Re: 2025 TRANSPORTATION ELECTRIFICATION PLAN / 2025 INTEGRATED
DISTRIBUTION PLAN / DOCKET NO. E002/M-25-142**

Dear Ms. Bergman,

EVgo Services, LLC (“EVgo”) appreciates the opportunity to provide comments on Xcel Energy’s (“Xcel” or “the Company”) 2025 Transportation Electrification Plan (“TEP”) as filed in Docket No. E002/M-25-142 on October 31, 2025.

Introduction & Recommendations

About EVgo

EVgo is one of the nation’s leading public fast charging providers. With more than 1,100 fast charging stations across 47 states, EVgo strategically deploys localized and accessible charging infrastructure by partnering with leading businesses across the U.S., including retailers, grocery stores, restaurants, shopping centers, gas stations, rideshare operators, and autonomous vehicle companies. At its dedicated Innovation Lab, EVgo performs extensive interoperability testing and has ongoing technical collaborations with leading automakers and industry partners to advance the EV charging industry and deliver a seamless charging experience. EVgo is an active participant in the market for direct current fast-charging (DCFC) in Minnesota, currently owning and operating 18 fast-charging stalls with plans for expansion.

Summary of Recommendations

To support the Commission’s review of Xcel Energy’s 2025 Transportation Electrification Plan, EVgo provides the following recommendations, with greater detail provided in subsequent sections. EVgo recommends the Commission:

- Approve the proposed Commercial EV Infrastructure Rebate and Advisory Program with the following modifications:
 - Direct Xcel to increase the four-year \$48.4 million program budget by at least 25% (to \$60.5 million) to better address Minnesota’s EV charging infrastructure gap and align with Xcel’s more robust programs in other states.
 - Direct Xcel to allow applicants to begin construction, at their own risk, after a specified date prior to the application window, rather than the date of an approval letter. This will accelerate charger deployment and reduce bottlenecks related to utility coordination.
- Direct Xcel to work with stakeholders to develop, and propose in its next rate case, a new optional commercial tariff targeting public DCFC sites that reflects DCFC usage characteristics and supports a broad range of load factors.

Comments

Commercial EV Infrastructure Rebate and Advisory Program

Approve the Program with Modifications

EVgo strongly supports Xcel’s proposed Commercial EV Infrastructure Rebate and Advisory Program. The inclusion of both Electric Vehicle Supply Infrastructure (EVSII) and Electric Vehicle Supply Equipment (EVSE) components reflects a comprehensive approach that addresses the needs of commercial customers and is consistent with successful models implemented in other jurisdictions. The proposed incentive levels, which provide support for both standard and environmental justice areas, are well-calibrated to overcome the significant upfront costs associated with deploying public fast charging stations. These programs are essential for enabling market-driven solutions and accelerating the development of a robust charging network. Therefore, EVgo recommends the Commission approve the proposed Commercial EV Infrastructure Rebate and Advisory Program with the modifications outlined below.

Expand Program Budget to Better Address Charging Demand

According to Xcel’s modeling, Minnesota will require approximately 5,000 public DC fast charging ports and 30,000 level 2 ports—totaling 35,000 ports—by 2030 to reach the state’s goal of 20% EV market penetration. However, at the current rate of deployment, this target would not be met until 2038 for the DCFC network—eight years behind the goal.¹ Presently,

¹ Xcel Energy. (2025). *2025 Transportation Electrification Plan* (Docket No. E002/M-25-142). Minnesota Public Utilities Commission, at 34.

Xcel's territory includes about 490 DC fast charging ports and 1,584 level 2 ports, for a total of 2,074.² The Commercial EV Infrastructure Rebate Program is expected to support only 5,524 total ports by 2029,³ which accounts for just 17% of the remaining infrastructure needed to meet Minnesota's electrification objectives.⁴

EVgo recognizes that the Company intends for the rebate program to act as a catalyst and that closing the gap will require leveraging other funding sources such as federal and state programs. While these funding sources can provide valuable support, they are often constrained by limited budgets and/or strict eligibility criteria and program requirements.

At present, utility funding programs represent some of the most reliable, consistent, and effective sources of support for DCFC infrastructure. Therefore, utilities and regulators should continue to play a leading role in advancing transportation electrification initiatives.

Xcel has proposed a budget for the Commercial EV Infrastructure Rebate and Advisory Program of \$48.4 million over 4 years (roughly \$12.1 million per year). EVgo recommends that the Commission direct Xcel to increase the budget by at least 25% to \$60.5 million (\$15.1 million per program year) to allow the utility to support the market in addressing a greater portion of the infrastructure gap. This investment remains modest compared to Xcel's similarly structured program in Colorado, for which a budget of approximately \$35.3 million annually has been approved.⁵ It's also in line with other recently approved program budgets across the country, such as ComEd Illinois' make-ready program which has an approved budget averaging \$14.8 million per year,⁶ and Georgia Power's make-ready program which has a budget of approximately \$17.6 million annually.⁷ Expanding the program budget will not only help meet anticipated demand by beginning to close the state's infrastructure gap but also deliver long-term benefits to ratepayers by lowering

² *Id.* at 32.

³ *Id.* at 58.

⁴ 35,000 total ports needed - 2,074 existing ports = 32,926 remaining ports needed. 5,524 ports to be supported by program / 32,926 remaining ports needed = .167 (17%).

⁵ Decision No. C24-0223, *Application of Public Service Co. of Colorado for Approval of its 2024-2026 Transportation Electrification Plan*, Proceeding No. 23A-0242E (Colo. P.U.C. Apr. 10, 2024), at 61.

⁶ Commonwealth Edison Company, Compliance Filing for Beneficial Electrification Plan 2, Illinois Commerce Commission, Docket No. 24-0484, at 42 (filed Dec. 16, 2024), available at <https://www.icc.illinois.gov/docket/P2024-0484/documents/366102/files/641295.pdf>.

⁷ See Ga. Pub. Serv. Comm'n, *In re Georgia Power Co. 2022 Rate Case*, Order Adopting Settlement Agreement as Modified, Docket No. 44280, ¶ 33 (Dec. 20, 2022) (approving the Electric Vehicle Make Ready Program at 65% of the Company's requested budget of \$81 million); see also Ga. Pub. Serv. Comm'n, *In re Georgia Power Co. 2022 Rate Case*, Order Granting Joint Petition to Extend the Alternate Rate Plan, Docket No. 44280, Attachment 1 ¶ 14(c) (July 1, 2025) (continuing Make Ready spending at the same previously approved budget levels).

costs through greater electricity sales. A 2024 study by Synapse Energy Economics found that, since 2011, EVs have contributed significantly more to utility revenues than costs. Because of this, EVs have helped apply downward pressure on rates across the country.⁸ In Minnesota in particular, Synapse found that the utility revenues from EV adoption exceeded costs by \$16.9 million between 2011 and 2021,⁹ demonstrating that transportation electrification provides net benefits to utility ratepayers. By making a more robust commitment, Xcel and the Commission can increase benefits for all customers and ensure Minnesota makes meaningful progress toward its transportation electrification objectives.

Allow Construction to Begin Prior to Utility Approval Letter

Currently Xcel’s commercial EV charging infrastructure programs require projects to submit an application and wait to receive an approval letter from the utility before they can begin construction, which can delay the deployment of chargers.

EVgo recommends that the Commission direct Xcel to allow applicants to the Commercial EV Infrastructure Rebate and Advisory Program to begin construction, at their own risk, after a specified date prior to the opening of the application window, rather than the date of execution of an approval letter. This approach will expedite EV charging infrastructure deployment,¹⁰ reduce pressure on utility staff to coordinate approvals and timelines, and—importantly—help Xcel achieve the Program’s electrification goals sooner.

Allowing construction to begin earlier will compress the overall timeline for energizing charging stations, ensuring that the utility program is a source of acceleration rather than delay. It will also align the program with industry development cycles, which are typically continuous.

Rates to Support DCFC Deployment

Develop a New Optional Commercial Rate for DCFC Customers

Effective commercial rate design is critical to enabling transportation electrification and the availability of alternatives to traditional commercial rate designs is essential for scaling

⁸ Synapse Energy Economics, Electric Vehicles Are Driving Rates Down for All Customers (January 2024), <https://www.synapse-energy.com/sites/default/files/Electric%20Vehicles%20Are%20Driving%20Rates%20Down%20for%20All%20Customer%20Update%20Jan%202024%2021-032.pdf> at 3.

⁹ Synapse Energy Economics, Electric Vehicles Are Driving Rates Down for All Customers: State by State Cumulative EV Net Rate Impact Summary (June 2024), https://www.synapse-energy.com/sites/default/files/EV%20All%20State%20List%20PDF_0.pdf, at 14.

¹⁰ EVgo. (n.d.). *Connect the Watts™: Make-Ready Best Practices* [PDF]. Retrieved from https://site-assets.evgo.com/f/78437/x/3e6d60c553/connect-the-watts_make-ready-best-practices.pdf.

DCFC deployment.¹¹ DCFC infrastructure is critical to reach the increasing population of EV drivers and is especially important for providing charging access to drivers without chargers at their residence or workplace such as multifamily residents and renters.

However, high and unpredictable electricity costs—especially due to demand charges—can discourage infrastructure buildout in utility territories with less favorable rate structures. As National Renewable Energy Laboratory explains, for DCFC stations “[e]lectricity costs represent a significant portion of the operational budget, especially for high-power DCFC stations serving numerous vehicles daily.”¹² This is because DCFC stations have highly variable, “spiky” load profiles—short periods of high electricity demand followed by long periods of low or no usage. As a result, they typically have lower load factors than most commercial customers. Traditional commercial rates, which often include demand charges and presume higher load factors, are not designed for this usage pattern and can result in disproportionately high operating costs for DCFC operators. Thus, when rates are not tailored to the unique characteristics of DCFC stations, they can create a significant barrier to third-party investment and slow the deployment of public charging infrastructure.

Xcel previously recognized this issue and offered a Public Charging Pilot Service (Rate Code A90) with a demand limiter that supported DCFC sites with lower load factors (up to about 14%). As the Company explains “[t]he current demand limiter, which limits billed demand to no greater than the value in kW calculated by dividing kWh sales for the month by 100 hours, limits the overall impact demand charges can have on these customers.”¹³ While the introduction of the Public Charging Pilot Service was a positive step forward, the impact of this rate was minimal due to the low load factor limit. Indeed, charging providers such as EVgo and Tesla,¹⁴ and Electrify America¹⁵ suggested in 2023 TEP comments that the demand limiter should be modified to support stations with up to a 24 percent load factor.

¹¹ Stegall, L. (2023, May 16). *7 Principles for Commercial Rate Design to Enable Transportation Electrification*. EVgo. Retrieved from <https://www.evgo.com/blog/7-principles-for-commercial-rate-design-to-enable-transportation-electrification/>.

¹² 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>.

¹³ Xcel Energy. (2025). *2025 Transportation Electrification Plan* (Docket No. E002/M-25-142). Minnesota Public Utilities Commission, at 42.

¹⁴ EVgo & Tesla. (2024, January 24). Comments on the 2023 Transportation Electrification Plan (Docket No. E002/M-23-452). Minnesota Public Utilities Commission, at 2.

¹⁵ Electrify America. (2023, December 20). Comments on the 2023 Transportation Electrification Plan (Docket No. E002/M-23-452). Minnesota Public Utilities Commission, at 3-5.

This would have brought the rate offering into alignment with other demand charge alternative rates across the country. However, these recommendations were not adopted.

In the current TEP, Xcel proposes closing the Public Charging Pilot Service to new customers who will instead be served under standard commercial tariffs. While the Company's standard commercial tariffs also include demand limiter language, they similarly support load factors up to only about 14%.

EVgo is concerned that the Company does not propose a more viable demand charge alternative rate for DCFC customers to replace the Public Charging Pilot Service. Thus, EVgo recommends that the Commission direct Xcel to work with stakeholders to develop, and propose in its next rate case, a new optional commercial tariff targeting public DCFC customers. The rate should reflect their unique load profiles and support the financial viability of fast charging infrastructure. The rate should be structured to support a broader range of load factors than A90 and the current demand limiters. It should draw on established models from other states, such as Xcel Energy's fully volumetric "S-EV" rate in Colorado and the New York utilities' EV Phase-In Rates that will reduce demand charges for DCFC customers with load factors up to 24%.¹⁶

Stakeholder feedback on the proposed 2025 TEP supported pairing effective rates with rebates.¹⁷ While the EVSI and EVSE rebate programs are important mechanisms to support DCFC deployment, they address different barriers than rates. Even with rebates, the long-term success and sustainability of DCFC sites depend on manageable and predictable operating costs. Electricity rates directly impact the ongoing cost of providing charging services. Without supportive rates, high operating expenses can undermine the benefits of upfront incentives, discourage continued operation, and limit the expansion of the charging network. In short, rebates and effective rate design serve different but complementary roles, and both are necessary to achieve widespread, equitable, and sustainable transportation electrification.

Establishing a successor commercial rate tailored to EV charging is essential to encourage third-party investment in transportation electrification. Such a rate will reduce operating cost uncertainty, promote equitable access, and accelerate DCFC deployment. It will also support load growth and as EV charging load grows, fixed system costs are distributed over

¹⁶ *Alternatives to Traditional Demand-Based Rate Structures for Commercial EV Charging*, Case 22-E-0236, at 32 (Jan. 19, 2023).

¹⁷ Xcel Energy. (2025). *2025 Transportation Electrification Plan* (Docket No. E002/M-25-142). Minnesota Public Utilities Commission, Attachment F, at 4.

more sales, helping reduce rates for all customers while helping to achieve the state's electrification goals.

Conclusion & Recommendations

EVgo appreciates the opportunity to provide feedback on Xcel Energy's 2025 TEP. EVgo urges the Commission to adopt the recommendations discussed herein to ensure a robust market for public fast charging infrastructure in Minnesota. EVgo looks forward to continued collaboration with the Company, the Commission, and other stakeholders to advance transportation electrification in the state.

Respectfully submitted,

/s/ Lindsey Stegall

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