

January 13, 2026

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

Re: In the matter of Xcel Energy's Integrated Distribution Plan, PUC Docket 25-142, Transportation Electrification Plan

### **Background and Grounding**

The City of Minneapolis (City) appreciates the opportunity to comment on Xcel Energy's Transportation Electrification Plan (TEP). The City has a strong interest in supporting a robust TEP, as this aligns with the City's goal of 25 Percent of all cars registered in the city being electric by 2030. The goal is slightly higher than the state goal of 20 percent electrification by 2030.

The City goal, as stated in our Climate Equity Plan (TCS.1.2) calls for "electrification of transportation, including but not limited to, increasing e-bike and EV charging infrastructure and supporting Metro Transit's plans for electric buses...". Further, Minneapolis has a strong emphasis on ensuring equity within transportation planning, including strategy TCS.3 in our Climate Equity Action plan, which seeks to provide "equitable access to electric transportation options for all Minneapolis residents".

The TEP's enabling legislation (MN statute 216B.1615) states that TEPs should include, "programs targeting transportation electrification in low and moderate-income communities and neighborhoods most affected by transportation-related air emissions. Furthermore, the legislation calls for an, "increase in access to the use of electricity as a transportation fuel for all customers, including those in low-income communities, rural communities and communities most affected by air emissions from the transportation sector".

### **Equity Analysis and Considerations**

The City of Minneapolis appreciates Xcel's geospatial analysis showing the overlap between program and incentive distribution and equity criteria. The results of this analysis highlight the emphasis on investment in areas disproportionately impacted by transportation pollution, and separately, areas with concentrated multifamily housing. Prioritized investment in these areas generally aligns with the intent of prioritized investment and benefit in our disadvantaged communities, as outlined in the City's Climate Equity Plan.

Further, the City is pleased to see the continuation of support for the EVIE Community Carshare service

and the MUD Pilot. We agree with the unique benefits that these services are providing. As these services continue to be delivered and offer strong benefits, we encourage continued Xcel support. This partnership is an excellent example of working with a local program provider that is focused on delivering services in underserved areas of our community.

### **Transit Electrification**

We believe further study of the grid benefits and emissions benefits from V2G services will have long-term benefit to our communities. Accordingly, we support the inclusion of the School Bus V2G Program and appreciate and the revised focus on broader support for electric school busses beyond utility owned equipment. We look forward to seeing the analysis and results from this pilot.

Separately, the City of Minneapolis believes that including support for public transit electrification is a missed opportunity to prioritize equity. Transit is a key strategy to meet the equity goals as stated in the TEP's enabling legislation (MN Statute MN statute 216B.1615). As transportation is the largest source of greenhouse gas emissions in Minnesota, an increase in mode shift to public transit is vital to address climate change. Additional utilization of electric transit vehicles will offer both climate and air quality benefits.

**Recommendation:** The City recommends that special consideration be given to transit bus services and charging infrastructure support. The transit charging program could mirror that of the school bus charger rebates (EVSE) as currently transit is only eligible for EVSI rebates.

### **ECO Incentives**

Xcel Energy is a valued and important partner in both our buildings and transportation decarbonization strategies. For this reason, we believe that ECO incentive modifications should be carefully considered and balanced. Investments that reduce energy burden for our residents, such as energy efficiency and weatherization, should be prioritized and weighted appropriately compared to other incentives.

Home and business energy efficiency incentives are applicable to more community members, including those most underserved in our community. Transportation electrification investments that reduce the cost of transportation and increase access to clean transportation are important, however less accessible to many individuals in underserved communities who do not own their own vehicle. Equity and overall accessibility by all to incentives should be considered and those with greater need should be given priority in proposed incentive structures.

**Recommendation:** As transportation electrification incentives are considered within the existing framework of ECO, the City recommends that approvals be balanced with other building and home incentives which are accessible to more individuals in our environmental justice communities. Additionally, incentives that are paired with transportation partners that operate vehicles serving individuals in our most disadvantaged communities should be prioritized. These incentives are more accessible to all, including those with lack of access to transportation options.

### **Other Considerations**

The City of Minneapolis sees a gap in the accessibility of low-cost EV charging rates for residents in our community. Currently, residential EV rates are designed for residents that typically live in owner-occupied

housing. This makes cost-saving EV rates like TOU, off-peak, or managed-charging rates far less accessible to low and moderate-income community members.

To create greater accessibility and shared benefit across all ratepayers, the City of Minneapolis sees an opportunity to create a public charging rate to make low-cost residential charging rates accessible to more residents. The City believes that publicly available and publicly owned Level 2 charging infrastructure that is in proximity to multifamily housing is a prime use case for piloting such a rate. The City would be a willing and interested partner in such a development.

While not a matter outlined in Xcel's TEP, the City appreciates the opportunity to comment on this gap for consideration in future rate case filings.

**Recommendation:** The City encourages creation and piloting of a cost-savings EV charging rate that can be made available to public charging stations serving those living in near-by multifamily housing.

We appreciate the opportunity to comment on Xcel's Transportation Electrification Plan. We believe there is significant benefit that will be delivered from many of the programs and incentives articulated in this plan. We look forward to continued collaboration with both the Public Utilities Commission and Xcel Energy on promoting and expanding equitable transportation electrification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Megan Hoyer', written in a cursive style.

Megan Hoyer  
Director of Climate Equity Action  
City of Minneapolis

Frank Hornstein  
Intergovernmental Relations Coordinator, Sustainability  
City of Minneapolis