

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Hwikwon Ham	Commissioner
Audrey Partridge	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

November 18, 2025

**RE: In the Matter of Otter Tail Power Company’s 2023 Integrated Distribution Plan
Docket No. E017/M-23-380**

Initial Comments of Fresh Energy, Union of Concerned Scientists, Sierra Club, and Plug In America

Fresh Energy, Union of Concerned Scientists, Sierra Club, and Plug In America (collectively the Clean Energy Groups, or CEGs) submit these Initial Comments in response to the Commission’s October 15, 2025 [Notice of Comment Period](#) on Otter Tail Power Company’s October 3rd, 2025 [submission](#) for approval of a new EV Credit Rider in amendment to its 2023 Integrated Distribution Plan. We appreciate the opportunity to participate in this docket.

The environmental and grid-benefits of EVs are well documented, however, accessing the benefits of the most affordable off-peak rates (and achieving the grid benefits associated with managed charging) has often required the installation of a costly second meter. The CEGs laud the effort by Otter Tail Power (OTP) to expand their offerings to electric vehicle drivers to promote efficient use of the grid and provide cost-savings to more customers. The proposed EV Credit Rider (*EVantage*) would be an important offering that would allow customers to access incentives for grid-beneficial charging without the expense of a second meter to enhance the affordability of clean vehicles, and it would also make an important first step into vehicle-grid integration (VGI) for OTP. [Research from the Union of Concerned Scientists](#) has indicated that even modest amounts of managed charging in VGI can mitigate the need for some grid upgrades.¹

This program has the potential to improve affordability at both the household and grid level and it has our support. The CEGs recommend that the **PUC approve the proposal**, subject to the

¹ Houston, Samantha, et al., “Harnessing the Power of Electric Vehicle: Vehicle-Grid Integration for a Cleaner, Cheaper, More Reliable California Electricity System s,” (June 2025)
<https://www.ucs.org/sites/default/files/2025-06/harnessing-the-power-of-evs-full-report.pdf>.

modifications recommended below and on assumption that OTP will address the questions posed by the CEGs in the utility's reply comments.

Recommendations:

If approved, the *EVantage* program will create a new choice for OTP customers to be compensated for their flexibility when they charge their EVs without significant up-front investment in a second meter. Additional choices are almost always beneficial to customers, however, to maximize the number of customers who actually sign up for this program, the CEGs recommend that **the PUC approve the proposed EV Credit Rider, while requesting the following modifications:**

- OTP expands eligibility for Level 2 EV Charger rebates to *EVantage* customers. The \$500 rebate is already available to OTP customers on their Dual Fuel, Deferred Load, Fixed Time of Delivery, RDC, or Minnesota Electric Vehicle Charging Rate.
- OTP offers access to *EVantage* to customers on its whole-home TOU rate pilot. Although the cost-effectiveness calculation may be different for this customer segment, it is worth exploring how the benefits of active managed charging change within the context of TOU rates.
- OTP identifies current EV owners who are not on a managed charging rate and advertise the potential benefits to encourage *EVantage* program uptake.
- OTP explores if the technology deployed in this *EVantage* program could be harnessed in multifamily settings, as this customer segment remains without any dedicated EV offerings.

Questions:

The CEGs request that OTP offer further information in reply comments regarding the proposed EV Credit Rider:

- Which MISO emergency conditions will trigger longer periods of OTP control (e.g. Emergency Pricing Tier 0, EEA1, EEA2, etc.)?
- Why is a hardwired relay configuration required?
- What is the expected cost range for additional relays, if deemed necessary, a participant may have to pay for participation in this program?
- Please provide the worksheets containing the calculations for the incentive levels.
- Please provide cost estimates for administration of an option for customers to opt-out of a limited number of control periods.

Conclusion:

The Clean Energy Groups recommend the Commission approve the EV Credit Rider with recommended modifications. We reserve the right to offer additional recommendations in our reply comments based on the utility's responses to our questions.

Respectively submitted,

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CERTIFICATE OF SERVICE

I, Nicholas Haeg, hereby certify that I have this day, served a copy of the following document to the attached lists of persons by electronic filing and electronic mail.

Comments of Fresh Energy, Sierra Club, Union of Concerned Scientists, and Plug In America

Docket No. E017/M-23-380

Dated this 18th day of November 2025

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