

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

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In the Matter of Minnesota Power’s Petition
for Approval of an Electric Vehicle
Commercial Charging Rate Pilot

DOCKET NO. E-015/M-19-337

**COMMENTS OF THE OFFICE OF
THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) submits the following Comments in response to Minnesota Power’s proposal for an electric vehicle (EV) commercial-charging-rate pilot program. The OAG supports integrating new EV load onto the electric system where it makes economic and environmental sense to do so. Unfortunately, the Company’s pilot, as proposed, does not go far enough to harness the benefits of EVs. Therefore, if the Commission approves the pilot, it should adopt the modifications discussed in these Comments. In particular, the Commission should reject the Company’s proposal to cap pilot participants’ demand charges at 30 percent of their bills because it would send conflicting price signals and constitute a subsidy in favor of participants.

BACKGROUND

I. THE COMMISSION’S FINDINGS REGARDING UTILITY EV OFFERINGS

In December 2017, the Commission opened an inquiry into electric vehicle (“EV”) charging and infrastructure.¹ On February 1, 2019, it issued an order making numerous findings

¹ *In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure*, Docket No. E-999/CI-17-879.

about the potential impact of EVs on Minnesota’s electric system, utilities’ role in electrifying the state’s transportation sector, and its expectations for future EV rate offerings.²

The Commission found that transportation electrification *could* further the public interest, but that *how* EVs are integrated with the grid would be critical to maintaining affordable electric service that benefits all ratepayers.³ To ensure that EV adoption promotes the public interest, the Commission encouraged utilities to adopt time-varying rates that encourage charging at times when system demand is low and renewable generation is high.⁴

The Commission’s order also contemplated that utility proposals for new EV offerings would be supported by cost–benefit analysis that accounts for both the societal costs of power-plant emissions and the benefits of vehicle-emission reductions.⁵ A pilot-program proposal, depending on the pilot’s scope and cost, may not require extensive cost–benefit analysis. But all pilot proposals are expected to at least include “specific evaluation metrics” that identify what the utility expects to learn from the pilot.⁶

The Commission directed investor-owned utilities to file information about their planned EV rate offerings, and gave them a deadline of October 31, 2019, to file proposals designed to “enhance the availability of or access to charging infrastructure, increase consumer awareness of EV benefits, and/or facilitate managed charging or other mechanisms that optimize the incorporation of EVs into the electric system.”⁷

² Docket No. E-999/CI-17-879, ORDER MAKING FINDINGS AND REQUIRING FILINGS (hereinafter “EV Order”).

³ EV Order at 10.

⁴ *Id.*

⁵ *Id.* at 8.

⁶ *Id.* at 11.

⁷ *Id.* at 13.

II. MINNESOTA POWER’S COMMERCIAL EV PILOT PROPOSAL

On May 16, 2019, Minnesota Power filed a proposal for a three-year EV commercial-charging-rate pilot program in this docket. The pilot would be open to commercial and industrial customers with an EV charging load in the 10-to-10,000 kilowatt (kW) range—typically businesses with EV fleets or operators of public-charging stations. According Minnesota Power, six such customers, who currently take service under the Company’s “General Service Demand” rate, experience demand charges that comprise more than 50 percent of their bills.

The proposed pilot attempts to address high demand charges from EV charging through two tariff provisions. First, only demand that occurs during an “on-peak” period, defined as “8:00 a.m. to 10:00 p.m., Monday through Friday, inclusive, excluding holidays,” is counted in computing demand charges—off-peak charging is demand-charge-free.⁸ Second, the pilot imposes a “demand charge cap,” whereby on-peak demand charges that exceed 30 percent of a customer’s total bill are refunded via an “EV Demand Credit.”⁹ The following table compares the existing General Service Demand tariff with the proposed pilot tariff:

Table 1: General Service Demand and Proposed Pilot Compared

	Existing General Service Demand Tariff	Proposed Pilot Program Tariff
On-Peak Demand Charge	\$6.50 / kW	\$6.50 / kW
Off-Peak Demand Charge	\$6.50 / kW	N/A
Energy Charge	\$0.07619 / kWh	\$0.07619 / kWh
Demand Charge Cap	N/A	30% Cap on Demand Charges as Percentage of Bill

⁸ Docket No. E-015/M-19-337, PETITION at Attachment (proposed tariff).

⁹ *Id.*

Minnesota Power describes the pilot’s purpose as “encouraging a growing market by reducing costs to public and fleet EV charging customers.”¹⁰ The Company states that it will track several metrics to assess the pilot’s success, including: (1) participants’ pre-pilot usage, (2) participants’ average cost per kilowatt–hour (kWh), (3) daily and monthly on- and off-peak pilot demand, (4) daily and monthly coincidence factors, and (5) daily and monthly on-peak, off-peak, and overall load factors, (6) comparisons of participant bills under different rate structures, and (7) growth in the number of fleet EV or public-charging stations.¹¹

ANALYSIS

I. THE COMPANY’S PILOT PROPOSAL IS FOCUSED ON THE WRONG GOALS.

The Commission is well aware of electric vehicles’ value proposition: Increased market penetration of EVs charging off peak can spread fixed system costs across a larger sales volume, putting downward pressure on rates. Simultaneously, replacing internal-combustion vehicles with electric vehicles powered by renewable generation can yield societal benefits in the form of decreased emissions from both tailpipes and smokestacks.

As the Commission alluded to in its February 1 order, however, this value proposition will not materialize unless care is taken to design EV offerings that allocate costs and benefits in a reasonable manner. The purpose of EV rate offerings should not be simply removing barriers to EV adoption or meeting the expectations of EV-owning customers. Utility EV rates should be designed to encourage cost-effective charging behavior that minimizes system costs and maximizes societal benefits.

Minnesota Power describes the pilot’s overarching purpose as “tak[ing] advantage of current and upcoming EV opportunities . . . while meeting customer expectations” and

¹⁰ PETITION 6.

¹¹ *Id.* at 20–21.

“encouraging a growing market by reducing costs to public and fleet EV charging customers.”¹² Meeting EV customer expectations and reducing their costs are, at best, indirectly related to the policy goals outlined by the Commission in its February 1 order, and these objectives appear to have resulted in a pilot proposal that favors the interests of EV customers over those of ratepayers generally. Below, the OAG describes several measures intended to align Minnesota Power’s pilot proposal with the public interest if it is approved.

II. THE PROPOSED DEMAND-CHARGE CAP HAS THE POTENTIAL TO RESULT IN UNREASONABLE RATES AND SHOULD BE REMOVED.

As discussed earlier, the proposed pilot has two features that attempt to reduce demand charges compared to the General Service Demand rate. First, the pilot eliminates charges for off-peak demand. And, second, it effectuates a demand-charge cap through an offsetting “EV Demand Credit” that effectively limits demand charges to 30 percent of a customer’s total bill. While eliminating off-peak demand charges should encourage beneficial off-peak charging, capping on-peak demand charges would weaken this incentive and introduce a confounding variable that would prevent the Company from learning the extent to which eliminating off-peak demand charges motivates customers to shift their usage.

Minnesota Power claims that pilot participants “may not be able to limit their charging to the off-peak hours”¹³ enough to avoid excessive on-peak demand charges. It is likely that not all charging under the pilot will occur off peak, but this does not make a demand-charge cap necessary. Eliminating off-peak demand charges, by itself, would give pilot participants the opportunity to significantly mitigate their EV charging costs. Adding the demand-charge cap

¹² PETITION 5–6.

¹³ *Id.* at 15.

would both weaken the incentive to charge off peak and increase the risk that nonparticipating ratepayers will end up subsidizing the pilot.

For these reasons, the Commission should require Minnesota Power to remove the demand-charge cap from the proposed pilot. Starting the program without the cap would not preclude the Company from seeking to impose one later if there is insufficient interest in the pilot or participants are unable to avoid incurring excessive demand charges. Removing the cap once it is in place, however, would be more difficult, since participants' expectations will already be established.

Finally, if the Commission allows the pilot to move forward with a demand-charge cap, it should require the Company to set the cap no lower than 50 percent. The Company suggests in its petition that it is problematic for General Service Demand customers to incur demand charges totaling more than 50 percent of their bills. A 50 percent demand-charge cap would ensure that this does not occur. Moreover, raising the cap would increase participants' incentive to charge off peak, decreasing pilot costs and better balancing the interests of participants and nonparticipants compared to a 30 percent cap.

III. THE PILOT'S 14-HOUR ON-PEAK PERIOD DOES NOT REFLECT THE COMPANY'S ACTUAL SYSTEM PEAK AND SHOULD BE SHORTENED TO REFLECT THE BEST AVAILABLE DATA.

A major advantage of EV load is that the timing of charging is flexible and can generally occur when overall system demand is low, both minimizing the variable costs of serving the additional load and, ultimately, delaying the need to add new capacity to the system. But without accurate price signals that tell customers the optimal time to charge their vehicles, much of this benefit is lost. Thus, efficiently integrating EV load requires that charging rates be set using the best available information about a utility's system.

Minnesota Power proposes an 8 a.m.–10 p.m. on-peak period for the pilot that matches the on-peak period in its Residential EV Service tariff.¹⁴ But new information has become available since that tariff was approved. On February 20, 2019, the Company filed a report outlining three alternative time-of-day rate designs that better reflect the characteristics of its system.¹⁵ These rate designs all feature a three usage periods—on-peak, off-peak, and super-off-peak—with differentiated rates in each period. The length of the on-peak period ranges from four hours to five hours.¹⁶

Minnesota Power acknowledges that “targeted On-Peak time periods would be ideal for this rate and for these customers,” but claims that “[a]ttempting to create a more targeted peak period for these commercial load customers is unadvisable without first providing an opportunity for both customer and utility education and analysis.”¹⁷ However, a major purpose of a pilot program like this one is to gather information about customer usage patterns under new rate structures. While the OAG does not have a specific recommendation for how long the pilot’s on-peak period should be, the Company should address in reply comments the feasibility of shortening it to more closely match the alternatives the Company identified in its February 20 filing in Docket No. 12-233.

IV. IF THE PROPOSED PILOT IS APPROVED, THE COMMISSION SHOULD REQUIRE THE COMPANY TO TRACK AND REPORT ON ADDITIONAL METRICS TO MORE FULLY INFORM ANY PERMANENT COMMERCIAL EV RATE OFFERING.

The purpose of a pilot program is to allow a utility to evaluate a new rate offering and gather data that can inform potential permanent offerings. Consistent with this purpose, the

¹⁴ See MINNESOTA POWER’S ELECTRIC RATE BOOK, vol. 1, § V, p. 8.2 (residential EV-service tariff).

¹⁵ See *In the Matter of Minnesota Power’s Temporary Rider for a Residential Time-of-Day Rate for Participants in the Smart Grid Advanced Metering Infrastructure Pilot Project*, Docket No. E-015/M-12-233.

¹⁶ Docket No. E-015/M-12-233, COMPLIANCE FILING 22 (Feb, 2019).

¹⁷ PETITION 14.

Commission’s EV Order requires all pilot proposals to include “specific evaluation metrics” that identify what the utility expects to learn from the pilot.¹⁸ As outlined above, Minnesota Power listed seven metrics that it intends to track as part of the proposed pilot, including daily and monthly on- and off-peak pilot demand, participants’ average cost per kilowatt–hour (kWh), and comparisons of participant bills under different rate structures.

If the pilot is approved with a demand-charge cap, the Company should also track and report the costs of EV Demand Credit through which the cap will be effectuated. The OAG asked Minnesota Power through an information request how it intends to track the cost of the EV Demand Credit, and whether it plans to seek recovery of that cost. The Company stated that it plans to use its customer information system “to track the measured and billed demand” for customers participating in the pilot, and that it “doesn’t anticipate requesting cost recovery for those costs.”¹⁹ The Commission should require the Company to separately track the monthly and yearly cost of the EV Demand Credit, both for the pilot as a whole and for each participant, and report it annually beginning after the first full year of pilot operation.

Finally, the Commission recently approved Xcel Energy’s proposals for an EV fleet pilot and a public-charging pilot, imposing a number of reporting requirements.²⁰ There are important differences between Xcel and Minnesota Power’s pilots—most notably, Xcel will own behind-the-meter infrastructure, whereas Minnesota Power’s proposal would not increase its rate base. But most of the reporting requirements for Xcel’s pilots appear to be relevant and useful for evaluating Minnesota Power’s pilot. The OAG requests that the Company identify in reply

¹⁸ EV Order at 11.

¹⁹ See Attachment A to these COMMENTS (response to OAG IR No. 005).

²⁰ See *In the Matter of Xcel Energy’s Petition for Approval of Electric Vehicle Pilot Programs*, Docket No. E-002/M-18-643, COMMISSION HANDOUT (April 12, 2019) (listing reporting requirements to be included in forthcoming order).

comments any Xcel reporting requirements that it does not believe are appropriate for its pilot; the OAG will make a final recommendation on this issue in its reply comments.

CONCLUSION

The OAG strongly supports utility proposals that reduce system costs, drive down greenhouse gas emissions, and improve societal and environmental outcomes. Electric vehicles hold the promise of delivering on all these counts. But these outcomes will only be realized through thoughtful rate design and reporting metrics focused on maximizing system-wide and societal benefits. If the Commission approves Minnesota Power’s proposed pilot, its approval should be conditioned on (1) removing or reducing the demand-charge cap, (2) shortening the on-peak period to reflect the best available data, and (3) adopting additional reporting metrics to maximize the pilot’s value as a tool to inform future offerings.

Dated: June 17, 2019

Respectfully submitted,

KEITH ELLISON
Attorney General
State of Minnesota

s/ **Peter G. Scholtz**

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ATTORNEYS FOR OFFICE OF THE
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**State Of Minnesota
Office Of The Attorney General
Utility Information Request**

*In the Matter of Minnesota Power's Petition
for Approval of its Electric Vehicle Commercial
Charging Rate Pilot*

MPUC Docket No.

E-015/M-19-337

Requested from: Minnesota Power

By: Peter Scholtz
Telephone: (651) 757-1473

Date of Request: May 30, 2019
Due Date: June 11, 2019

Reference: Proposed tariff at XX

If the EV Demand Credit is approved, how will MP track its cost? Does MP plan to seek recovery of this cost in a future Commission proceeding?

RESPONSE:

Minnesota Power plans to use its customer information system to track the measured and billed demand for customers participating in this Pilot. At this time, Minnesota Power expects the costs to be minimal and doesn't anticipate requesting cost recovery for those costs.

Response by: Jenna Warmuth
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June 17, 2019

Mr. Daniel Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
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**Re: In the Matter of Minnesota Power's Petition for Approval of an Electric
Vehicle Commercial Charging Rate Pilot
DOCKET NO. E-015/M-19-337**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Peter G. Scholtz**

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