



414 Nicollet Mall
Minneapolis, MN 55401

September 23, 2022

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

—Via Electronic Filing—

RE: PETITION FOR APPROVAL OF ELECTRIC VEHICLE PILOT PROGRAMS
DOCKET NOS. E002/M-18-643

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this request for Commission approval of modifications to our Fleet Electric Vehicle (EV) Pilot Service and Public Charging Infrastructure Pilots in the above-referenced docket to the Minnesota Public Utilities Commission.

Pursuant to Minn. Stat. § 216.17, Subd. 3, we have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Please contact Carl Cronin at carl.cronin@xcelenergy.com or 612-215-4669 if you have any questions regarding this filing.

Sincerely,

/s/

HOLLY HINMAN
REGULATORY MANAGER

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
PETITION FOR APPROVAL OF ELECTRIC
VEHICLE PILOT PROGRAMS

DOCKET NO. E002/M-18-643

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this request for Commission approval of modifications to our Fleet Electric Vehicle (EV) Pilot Service and Public Charging Infrastructure Pilots in the above-referenced docket. The requested modifications would allow us to continue to operate these pilots beyond the end of this year and provide additional operational budget flexibility.

The Company's Fleet EV Service and Public Charging Infrastructure Pilots were approved by the Commission in July 2019 for an initial three-year term.¹ We launched the Fleet EV Service Pilot formally in January 2020, with the Public Charging Infrastructure Pilot following in May 2020. As the Commission is aware, the initial customer interest in this pilot was modest, likely owing to the impacts of the global pandemic and related economic pressures on potential participants. Both pilots have seen increased participation in 2022, however.

With this request, we seek an extended "runway" for the pilots to avoid having to discontinue their operation in the near term as the Commission evaluates proposed program modifications in a related docket.

¹ See Docket No. E002/M-18-643. ORDER APPROVING PILOTS WITH MODIFICATIONS, AUTHORIZING DEFERRED ACCOUNTING, AND SETTING REPORTING REQUIREMENTS (July 17, 2019)

With this filing we ask the Commission for approval of limited changes to the pilots while the Commission is considering proposed changes to the pilots included in our recent petition setting forth additional program proposals. The Company requests the Commission approve 1) an extension of the Fleet and Public Charging pilot terms until there is final resolution of the Company's program modification request in Docket No. E002/M-22-432,² and 2) flexibility to move budgeted funds between the two pilots during this period of time.

PETITION

I. SUMMARY OF FILING

A one-paragraph summary is attached pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2 and Minn. Stat. § 216.17, subd. 3, Xcel Energy has electronically filed this document. A summary of the filing has been served on all parties on our miscellaneous electric service list and on the enclosed service list for Docket Nos. E002/M-18-643.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

² *In the Matter of the Petition of Northern States Power Company for Approval of a Public Charging Network, an Electric School Bus Pilot, and Program Modifications.*

B. Name, Address, and Telephone Number of Utility Attorney

Ian Dobson
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 - 8th Floor
Minneapolis, MN 55401
(612) 370-3578

C. Date of Filing

The date of this filing is September 23, 2022.

D. Statute Controlling Schedule for Processing the Filing

This Petition falls within the definition of a miscellaneous filing under Minn. R. 7829.0100, subp. 11, because no determination of Xcel Energy's general revenue requirement is necessary. Minn. R. 7829.1400, subps. 1 and 4, permits comments in response to a miscellaneous filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

E. Utility Employee Responsible for Filing

Holly Hinman
Regulatory Manager
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
(612) 330-5941

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

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Christine Schwartz
Regulatory Administrator
Xcel Energy
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regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Christine Schwartz at the Regulatory Records email address above.

V. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE

No significant revenue effect, net of incremental costs, is expected during the pilot period and our recommend modifications in this Petition should not result in additional costs. The two pilots are limited as to overall budget amounts and number of participating customers. The pilot learnings will include assessment of the amount of utilization and revenues that result from these initiatives.

VI. DESCRIPTION AND PURPOSE OF FILING

To extend the opportunity to gather learnings from the pilots and help optimize the experience for customers, we have requested several modifications to the Fleet EV Service and Public Charging Infrastructure Pilots as part of our petition filed in Docket No. E002/M-22-432.³ The proposed changes in the other proceeding include an increase in budget funds and budget flexibility for the pilots, an extension of the pilot terms through 2026, changes to eligibility requirements to allow a wider group of customers, and project scoring criteria with a strong equity focus.

We understand the scope of our recent proposal in Docket No. E002/M-22-432 will require time for stakeholders and the Commission to consider. With this filing, we ask the Commission to consider a narrow approval of more time-critical issues that do not add additional costs to the program but allow us to operate the pilots with continuity until the other matter is resolved. To the extent no parties timely file objections, the Company respectfully requests Commission review through its consent agenda process.

A. Pilot Participation to Date

The initial participants in the Fleet EV Service Pilot were placed into service in 2021 and 2022. The first projects for the Public Charging Infrastructure Pilots went into service in 2022 and we currently have three projects completed. We continue to recruit participants for both pilots. We have 11 site applications in process for the Fleet EV Service pilot. We have executed an agreement on applications for 4 sites, which are currently in the design/construction phase. We have 45 applications in process for the Public Charging Infrastructure Pilot, with most of those in the

³ See Page 59 of the August 2, 2022 Petition for greater details on all the proposed changes to the pilots.

application phases. Agreements have been reached for 32 projects which are currently in the design/construction phase.

B. Modification Details

To bridge the gap between the end of three year pilot term and the Commission's final decision on our broader program modification requests in the other proceeding, we ask that the Commission approve the following changes to our Fleet EV Service and Public Charging Infrastructure Pilots:

- Extend the terms of the Fleet EV Service and Public Charging Infrastructure Pilots beyond their initial three-year terms, to continue to support existing participants and onboard new customers until there is final resolution in the other proceeding; and
- Allow the Company to reallocate some or all the remaining Fleet EV Service Pilot dollars to the Public Charging Infrastructure Pilot if Fleet EV Service Pilot funding is available and not in demand by eligible fleet customers, as the Public Charging pilot is nearing budget depletion.

If the Commission grants the Company's request, it will allow continuity of service at a time when interest in the pilots is growing and will give us the opportunity to further our learning opportunities from the pilots.

The Public Charging Pilot has nearly exhausted the originally approved budget of \$9.2 million. Meanwhile, for the Fleet EV Service Pilot we expect to have spent about \$1.5 million of the approved budget of \$14.4 million by the end of this year. By approving a reallocation, but not additional funds, with this limited request the Company will be able to continue to enroll new customers into both pilots until the program modifications sought in the other proceeding are resolved.

The Company also notes that it previously committed to provide an evaluation of our existing EV pilots and programs in our 2023 TEP, and that these evaluations would primarily consist of a summary of pilot and programs, operations, data and metrics, and other information gathered as part of our EV annual reporting requirements.⁴ We understand the value that these evaluations can provide to the Commission and our stakeholders and we will provide them in our 2023 TEP.

CONCLUSION

⁴ See Page 2 of our October 11, 2021 Reply Comments in Docket Nos. E002/M-15-111, et al.

The Company appreciates the Commission's consideration of this narrow set of changes to our Fleet EV Service and Public Charging Infrastructure Pilots. Our requested modifications would allow us to continue to operate these pilots beyond the end of this year and provide additional operational budget flexibility while the Commission considers our broader modification proposals filed separately.

Dated: September 23, 2022

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY'S
PETITION FOR APPROVAL OF ELECTRIC
VEHICLE PILOT PROGRAMS

DOCKET NO. E002/M-18-643

PETITION

SUMMARY OF FILING

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this request for Commission approval of modifications to our Fleet Electric Vehicle (EV) Pilot Service and Public Charging Infrastructure Pilots in the above-referenced docket. We are requesting Commission approval to continue operating both pilots beyond the end of this year and approval to reallocate budgeted funds between the two pilots. Our requested modifications would allow us to continue to operate these pilots without interruption and provide additional operational budget flexibility.

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E002/M-18-643

Dated this 23rd day of September 2022

/s/

Christine Schwartz

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