



August 2, 2022

VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of Minnesota Power's Commercial
Charging Rate Pilot Compliance Filing
Docket No. E015/M-19-337
REPLY COMMENTS

Dear Mr. Seuffert:

Enclosed please find Minnesota Power's Reply Comments regarding its requested extension of the Commercial EV Charging Rate Pilot.

If you have any questions regarding this filing, please feel free to contact me at (218) 428-9846 or jmccullough@mnpower.com.

Yours truly,



Jess McCullough
Public Policy Advisor

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Attach.

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

In the Matter of Minnesota Power's
EV Commercial Charging Rate Pilot Compliance Filing

Docket No. E015/M-19-337
REPLY COMMENTS

I. INTRODUCTION

On December 12, 2019 the Minnesota Public Utilities Commission ("Commission") approved Minnesota Power ("Company")'s three-year EV Commercial Charging Rate Pilot ("Pilot"). On June 13, 2022, the Company submitted a compliance filing requesting an extension of the 30 month timeline established in Order Point 3 until January 31, 2024 to allow for a more robust dataset to be generated and collected upon which to base a permanent Commercial EV Rate. On June 23, 2022 the Commission issued a Notice of Comment Period regarding whether the Commission should grant the Company's request, as well as moving the Company's EV annual report from December 12 to June 1 in line with other EV reporting requirements, and establishing a negative check off process for uncontested modifications by delegating authority to the Executive Secretary to approve uncontested modifications to the Pilot. On July 21, 2022 the Department of Commerce, Division of Energy Resources ("Department") filed comments recommending that the Commission approve the Company's request and enact both proposed changes. The Department also recommended that the Company address in its Reply Comments when it intends to conduct an analysis of the current Pilot and provide a narrative explanation of what barriers may exist to customer participation in said pilot, as well as any feedback from participants and non-participants. The Company addresses these recommendations below.

II. RESPONSE TO DEPARTMENT RECOMMENDATIONS

**A. A Timeline to Evaluate the Present Commercial EV Rate Pilot
Program Before Proposing a Permanent Commercial EV rate**

The Company plans to conduct an analysis of the present Commercial EV Rate Pilot prior to proposal of a permanent Commercial EV Rate. Should the Commission decide to move the Company's Annual Report from December 12 to June 1, the Company will submit its completed analysis of the present Pilot with its proposed permanent Commercial EV Rate no later than January 31, 2024.

B. A Narrative Explanation of Barriers to Customer Participation and Related Participant and Non-Participant Feedback

In the Company's Request for Extension filed June 13, 2022 the multifaceted impacts of the COVID-19 pandemic upon customer participation in this pilot are discussed, including concerns about investing in fleet electrification due to supply chain challenges, increasing labor costs, and general economic uncertainty. These reasons were gathered informally from participant and non-participant feedback, the amount of which is too low at this point to generate a formal qualitative analysis.

III. CONCLUSION

Minnesota Power appreciates the support of the Department and the opportunity to respond to its recommendations. The Company here restates its commitment to meeting state and PUC emissions goals while providing reliable, affordable services that lower barriers to EV adoption among our customers. The Company hopes that through the responses above it has adequately answered questions and addressed concerns raised in the Department's comments.

If you have any questions regarding this filing, please contact me at 218.428.9846 or jmccullough@mnpower.com.

Dated: August 2, 2022

Respectfully,



Jess A. McCullough
Policy Advisor II
Regulatory Affairs
Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 428-9846

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 2nd day of August, 2022, she served Minnesota Power's Reply Comments in **Docket No. E015/M-19-337** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



Tiana Heger