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January 13, 2026

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
Saint Paul, MN 55101-2147

**RE: In the Matter of Xcel’s Transportation Electrification Plan, Docket No. E-002/M-25-142**

Dear Ms. Bergman,

The City of Edina (“City”) appreciates the opportunity to comment on the matter of Xcel Energy’s (“the Company”) 2025 Transportation Electrification Plan (“TEP” or “filing”). Xcel Energy is the electric utility service provider for Edina and the Company’s transportation electrification programs directly relate to Edina’s Climate Action Plan goals to increase electric vehicle charging access and electric vehicle adoption.

The City supports the Company’s initiatives to support State, regional, and local goals related to vehicle electrification, while continuing its commitment to deliver clean energy.

We respectfully submit these comments in response to the Commission’s notice of comment period issued November 13, 2025, related to the Company’s TEP.

*Notice of Comment Period Question 1. Should the Commission approve, modify, or reject Xcel Energy’s 2025 TEP?*

The City agrees with the Company’s plan to offer several new programs

*A. Commercial EV Infrastructure Rebate and Advisory Program:*

The City supports a rebate-focused program that assists commercial customers, including multi-family properties, to install EVSE by reducing the cost-burden of installation.

The City of Edina is actively electrifying its fleet and delivering charging options for both fleet and public users. The City currently has 22 fully electric and four hybrid electric vehicles in its fleet, 22 Level 2 charging ports reserved for fleet charging, and 24 additional Level 2 ports available for fleet and public charging. The City has considered a DC fast charger as part of its fleet and public charging infrastructure, but it has been cost-prohibitive to pursue. A rebate-focused program would help reduce costs and allow the City to further consider this option.

In addition, existing multi-family properties with structured parking (e.g., underground parking garages) are facing a high cost-burden to install EVSE. The City receives inquiries from multi-family building owners and residents looking for resources to retrofit their parking structures with EVSE, but there are almost no current financial incentives for multi-family buildings. By offering a rebate program for multi-family properties, the Company will help reduce barriers to this important growing customer segment.

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*B. Residential Advisory Services and Guided Charging Installation Program:*

When the City receives questions from its residents about charging options and programs, the City refers them to the Company and other trusted third-party electric vehicle and charging organizations. The Company providing comprehensive advisory programs to educate customers on charging options will continue assisting Edina residents on understanding their options when it comes to home charging and ensure this message comes from a trusted messenger.

The City requests the Company consider the following modifications in its proposed TEP programs:

*A. Commercial EV Infrastructure Rebate and Advisory Program:*

The City requests that the Company modify its Program Operations to accommodate customers, like the City of Edina, who have historically participated in Xcel Energy's FEAP and other Advisory Programs by fast-tracking their rebate applications. The City has extensive experience in siting, procuring, and installing EVSE. If the program requires every customer to participate in advisory services or coordinate additional reviews by the Company, it will create unnecessary steps for both the City and Company, causing significant delays in procurement and project installation.

*B. Residential Advisory Services and Guided Charging Installation Program:*

The Company's partnership with HOURCAR demonstrated significant reach to BIPOC and low-income users, as noted by the Company in the "Equity Considerations" section of its filing (Page 43). These are particularly difficult markets to reach, and the pilot results show successful engagement with vulnerable populations through both the EV Spot Network and carsharing hub pilots. However, it is unclear in the TEP filing how the Company will continue to support and partner with HOURCAR and other organizations to offer and expand carsharing hubs. There is one reference to the partnership continuing through the new Residential Advisory Program (Page 49), however, there is no additional clarification or explanation of how that partnership will continue or expand in Section III.B.

The City requests clarification from the Company on how it plans to continue to support and expand its carsharing opportunities with HOURCAR and other organizations to reach BIPOC and very low-income users through Spot Network charging and carsharing hubs.

The City of Edina has particular interest in expanding regional carsharing as part of its Climate Action Plan. In 2022, the University of Minnesota completed a feasibility study for the City on electric carsharing in a suburban environment, which included high-level site identification. The City would need to pursue a partnership with the Company and an organization like HOURCAR to successfully implement this type of program, but if the current Spot Network and carsharing programs don't expand their reach, the City would be unable to implement these Climate Action Plan strategies.



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Notice of Comment Period Question 2. Are there gaps in Xcel Energy's transportation electrification programs the Commission should address to ensure equitable customer outcomes?

As noted above, the Company's partnership with HOURCAR demonstrates continued success in engaging vulnerable populations and the City requests further clarification on how the Company intends to continue and expand this partnership, both logistically and financially.

For the Company's Commercial EV Infrastructure Rebate and Advisory Program, the Company intends to use the MPCA's "Understanding Environmental Justice in Minnesota" mapping tool to identify "EJ Communities." This map is a good first step to identifying higher-priority areas with concentrated poverty and BIPOC populations, but the tool excludes several suburban areas due to no consideration of statistically significant margins of error. There are several Census Tracts in the City of Edina that MPCA previously identified as EJ Areas, but when the agency decided in mid-2024 to no longer consider the margin of error in its analyses, these tracts were removed from designation. For example, in Census Tract 27053024003 (near the intersection of MN-100 and I-494) 38.98% of residents identify as BIPOC, just below MPCA's 40% threshold. However, this Tract was previously included as an EJ Area because it has a large margin of error of 12.61%, but with the MPCA's decision to change its methodology in 2024, this Census Tract and its residents are excluded from programs where eligibility is based on geographic location. The City's proposed solution is for the Company to use the publicly available data from the American Community Survey with consideration of the margin of error to include additional Minnesotans in Census Tracts that meet the designated criteria (e.g., at least 40% people of color).

In addition, if the Company solely relies on MPCA's map, this approach unintentionally excludes affordable housing built in higher income areas from participating in the Company's Commercial EV Infrastructure Rebate. Through successful implementation of the City's affordable housing policy, Edina has more than 50 multifamily buildings with designated affordable units. These buildings are spread across our city and may be in a census tract that does not meet environmental justice or income-qualified criteria, but the building, the units, and its residents do. The City requests additional consideration by the Company to include building-level income-qualification for its EJ rebate amounts for multifamily Level 2 rebates.

Notice of Comment Period Question 6. Are there other issues or concerns related to this matter?

The Company includes an explanation of streetside charging opportunities (page 38-39), noting this approach is complex due to varying right-of-way requirements. The City of Edina agrees with this statement and would like to add that additional complexity is created due to local zoning codes and parking rules. The City of Edina, like many suburbs, seasonally restricts streetside parking to ensure the City can provide adequate snow removal services during snow events, meaning for several months out of the year, streetside charging, if available, would be unusable overnight. In addition, our local zoning code prioritizes off-street parking for new developments so that streets can instead be activated with pedestrian and bicycle infrastructure, furthering additional Climate Action Plan goals. The City agrees with the Company's determination that its proposed commercial rebate program can support a developer and municipality interested in streetside charging and that a separate streetside charging program should not be created.



In 2023, the Minnesota Department of Labor and Industry facilitated an Electric Vehicle Charging Facilities Technical Advisory Group (TAG) to create electric vehicle charging scoping and technical criteria to be adopted into the Minnesota Building Code. If adopted as written by the TAG, the building code will require new construction with parking facilities (e.g., parking spaces) to install a minimum number of EVSE-installed, EV-ready, and EV-capable spaces. This code change will significantly increase the number of spaces dedicated to EV charging in Minnesota. If not already, the Company should consider this code change as it forecasts budget and participation for its proposed commercial EVSI and EVSE rebates.

In summary, the City of Edina supports the Company's TEP filing with the following modifications:

- Update the Commercial EV Infrastructure Rebate Program's operations to create a fast-track for rebate applications from customers who have previously participated in the Company's FEAP and other advisory programs and have experience with siting, procuring, and installing EVSE to reduce administrative burden and prevent project delays.
- The Company provides additional operational and financial clarification on how it plans to continue to support and expand its carsharing opportunities with HOURCAR and other organizations via its proposed Residential Advisory Services and Guided Charging Installation Program.
- In addition to the proposed usage of the MPCA Environmental Justice mapping tool, include additional methodology to expand eligibility for the Commercial EV Infrastructure EJ Rebate:
  - Use publicly available data from the American Community Survey with consideration of the margin of error to include additional Minnesotans in Census Tracts that meet the designated criteria (e.g., at least 40% people of color).
  - Include building-level income-qualification for its EJ rebate amounts for multifamily Level 2 rebates.
- If not already, update its Commercial EV Infrastructure Rebate participation and budget to consider an increase in EVSI and EVSE installed due to forthcoming building code changes that will require EVSE, EV-Ready, and EV-Capable spaces in new parking facilities, resulting in a significant increase in the number of spaces dedicated to EV charging in Minnesota.

Edina appreciates the Commission's consideration of our comments.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'MBayer'.

/s/ Marisa Bayer  
Sustainability Manager  
City of Edina