



February 24, 2026

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

**RE: Reply Comments—In the Matter of Xcel Energy’s Transportation  
Electrification Plan  
PUC Docket No. E002/M-25-142**

Dear Ms. Bergman:

Weave Grid, Inc. (“WeaveGrid”) submits these Reply Comments in response to Initial Comments filed by parties in this docket and to Northern States Power Company d/b/a Xcel Energy’s (“Company”) Reply Comments regarding the Company’s 2025 Transportation Electrification Plan (“TEP”). These Reply Comments address the Company’s proposed Charging Perks active managed charging program.

WeaveGrid supports Commission approval of Charging Perks. We agree with the Company that active managed charging will become increasingly important as electric vehicle (“EV”) adoption grows to manage such growth affordably and reliably. In particular, the Company’s proposal is aimed at addressing distribution-level impacts that are not fully mitigated through system-peak-focused approaches alone.

**I. Description of WeaveGrid**

WeaveGrid is a software company that helps utilities support adoption of EVs and other customer-sited load flexibility through greater understanding of customer behaviors, utility customer programs, and distribution-level optimization. WeaveGrid’s technology leverages utility and device data—including embedded vehicle telematics and charging equipment data and controls—to transform disaggregated customer loads into a cohesive network of controllable grid resources. We work with utilities across the country, including supporting elements of the Company’s managed charging programs.

**II. Summary of Reply**

In summary:

- The record supports Commission approval of Charging Perks as a reasonable next step in the evolution of managed charging in Minnesota, particularly given the

Company's intent to expand beyond system-peak-only approaches and develop distribution-aware capabilities.

- Distribution value can be reflected within avoided cost frameworks, but the practical challenge is that avoided cost tools often lack the granularity necessary to consistently quantify localized service transformer- and feeder-level deferral value.
- Experience in other jurisdictions and emerging analytical methods support the proposition that distribution deferral value (including service transformer and feeder deferrals) can be material and can translate into ratepayer benefits through deferred or avoided infrastructure investment as EV adoption clusters.
- The Commission can address Minnesota Office of the Attorney General ("OAG") and Department of Commerce ("Department") concerns by continuing to collect program data and adopting evaluation and reporting that informs how program design should be refined over time, particularly as distribution-optimized operations and planning integration mature.
- Finally, as active managed charging expands, customer eligibility and program accessibility should be expected to improve over time. Authorized integration pathways are expanding across automakers and charging equipment providers, and the market trajectory supports broader participation through multiple authorized pathways.

### **III. Reply Comments**

#### **A. Program Scale and Distribution Benefits**

WeaveGrid recognizes and appreciates the OAG's and the Department's focus on cost-effectiveness and on ensuring the Commission has sufficient information to evaluate program reasonableness. The Company's reply comments acknowledge this dynamic and explain the rationale for proceeding: EV adoption is growing; unmanaged charging can create both system and localized peaks; and early investment is needed to develop scalable operational capabilities, reduce program delivery costs, and generate Minnesota-specific data to inform refinement. Notably, the Company's proposal of Charging Perks also responds to prior Commission direction in the TEP process to develop an active managed charging offering.<sup>1</sup>

In this context, the Commission may take notice that other jurisdictions have approved managed charging programs at significant scale, reflecting both policy and operational experience, including:

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<sup>1</sup> Order Approving Xcel Energy's 2023 Transportation Electrification Plan with Modifications, Docket No. E002/M-23-452 (May 9, 2024) (Order Point 21.a).

- **Colorado.** In Colorado, Xcel Energy’s Public Service Company of Colorado (“PSCo”) has a Commission-approved Transportation Electrification Plan that reflects managed charging participation at significant scale over the current TEP period, with Charging Perks assumed participation totaling more than 40,000 participants.<sup>2</sup>
- **Maryland.** In Maryland, the Commission has approved managed charging programs designed to deliver distribution-optimized outcomes. For example, BGE’s Smart Charge Management program aims to enroll 30,000 customers by 2027, and the Pepco and Delmarva’s Smart Charge Management program that “optimizes” charging by considering “distribution asset constraints” and aims to “avoid overloading the distribution system,” targets more than 29,000 customers.<sup>3</sup>
- **New York.** In New York, utilities have been administering managed charging programs for several years. Con Edison’s SmartCharge NY program reports a net enrollment count of more than 31,000 EVs as of December 31, 2025, reflecting meaningful participation levels at scale and what can be achieved over time as programs mature.<sup>4</sup>

These programs support broad participation goals and have informed a growing record regarding customer enrollment, retention, and dispatch performance. This broader record supports the Company’s position that proceeding now is prudent, particularly as EV adoption continues to increase and localized distribution impacts are likely to drive upgrade costs.

At the same time, comments suggesting that cost-effectiveness frameworks omit distribution benefits warrant clarification. Cost-effectiveness tests and avoided cost frameworks generally include transmission and distribution components. However, many methodologies are better suited to capturing coincident, system-level impacts than localized, non-coincident distribution impacts. In particular, quantifying transformer- and feeder-level deferral value can be limited by: (1) the availability of feeder- and transformer-specific data for valuation purposes; (2) the challenge of translating localized deferral opportunities into standardized avoided cost values; and (3) incomplete integration between program dispatch objectives and distribution planning processes.

The Company’s proposal is responsive to these issues by pursuing an active managed charging program capable of delivering both bulk-system and distribution-level benefits. As

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<sup>2</sup> Public Serv. Co. of Colo., *2024–2026 Transportation Electrification Plan* (Updated Aug. 2024) (Hearing Ex. 103, Attach. HS-1, Table 14: Residential Portfolio Assumed Participation) (assumed Charging Perks participation totals 40,009 for 2024–2026).

<sup>3</sup> Balt. Gas & Elec. Co., *Proposed Smart Charge Management Program* at 11–12 & n.8 (June 4, 2024) (forecasting 30,000 cumulative enrollments by 2027); Delmarva Power & Light Co. & Potomac Elec. Power Co., *Phase II Maryland Electric Vehicle Portfolio* at 28–29 (Case No. 9478) (describing SCM optimization based on “distribution asset constraints” to avoid overloading the distribution system and targeting ~27,000 Pepco and 2,150 Delmarva cumulative enrollments).

<sup>4</sup> Consol. Edison Co. of N.Y., Inc., *Managed Charging Implementation Plan* at 24 (filed Jan. 29, 2026) (Case 18-E-0138) (reporting net enrollment of 31,218 EVs as of Dec. 31, 2025).

the program is implemented and scaled, the Commission can support practical reporting and evaluation that inform ongoing refinement and strengthen the Company’s ability to quantify and incorporate distribution deferral value into program assessment, planning, and avoided-cost calculations.

## **B. Experience in Other Jurisdictions and Emerging Analytical Methods Quantifying Distribution Deferral Value**

The Commission’s consideration of Charging Perks occurs against a backdrop of increasing managed charging deployments nationally. Recent analytical work supports methods to define and quantify downstream distribution value—particularly service transformer and feeder deferrals—using program data, feeder loading insights, and distribution planning inputs, including:

- **The Brattle Group** analyzed real-world managed charging data and concluded that active managed charging can materially increase a distribution system’s EV hosting capacity and defer EV-driven infrastructure upgrades. Brattle reports that annual utility system benefits from distribution-optimized managed charging could be up to approximately \$400 per EV relative to unmanaged charging.<sup>5</sup>
- **Argonne National Laboratory** published findings from Maryland’s multi-utility Smart Charge Management pilot (Baltimore Gas and Electric, Pepco, and Delmarva Power & Light), evaluating strategies to optimize EV charging and enhance grid reliability based on multi-year program experience. Argonne and SEPA estimate downstream distribution benefits on the order of \$300 per EV-year driven by deferral of service transformer and feeder upgrades.<sup>6</sup>
- **AES Indiana** published an analysis indicating that “grid-optimized” managed charging, designed to address both system peak management and distribution network management, can defer a meaningful share of feeder and service transformer upgrades and increase net present benefits relative to approaches that address system peaks alone. AES reports \$1,275 per EV per year in “annual capital flexibility” under its analysis.<sup>7</sup>

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<sup>5</sup> The Brattle Grp., *Demonstrating the Full Value of Managed Electric Vehicle Charging* (Jan. 2026) (prepared for EnergyHub), <https://www.brattle.com/wp-content/uploads/2026/01/Demonstrating-the-Full-Value-of-Managed-Electric-Vehicle-Charging.pdf>

<sup>6</sup> Smart Elec. Power All., *Exelon’s Managed Charging Program* (webpage), <https://sepapower.org/resource/exelons-managed-charging-program/>; Note that this \$300 value does not include any value associated with increasing substation capacity or any other non-distribution benefits, including bulk system savings.

<sup>7</sup> AES Ind., *Getting Ahead of the EV Tipping Point: Proactive EV Management Strategies for an Efficient and Flexible Grid* (Oct. 2024), <https://www.aes.com/sites/aes.com/files/2024-10/Electric-Vehicle-EV-Chargplanning-FINAL.pdf>.

Collectively, these sources support the reasonableness of the Company's approach to developing distribution-optimized managed charging capabilities and planning integration through Charging Perks as EV adoption increases. These case studies also provide additional support for approving Charging Perks in this docket.

### **C. Technology Pathways and Eligibility**

WeaveGrid acknowledges the Clean Energy Groups' concern that reliance on manufacturer-authorized agreements and associated access fees may affect both program cost structure and near-term eligibility. These are reasonable considerations in a rapidly evolving market where automaker and charging-equipment capabilities, as well as commercial integration terms, continue to develop.

At the same time, the market trajectory is moving quickly toward broader authorized participation. Increasing numbers of automakers and charging equipment providers are enabling utility-oriented integrations, and eligibility should expand over time through multiple authorized pathways, including both telematics- and EVSE-based options. This trend is consistent with recent utility filings in other jurisdictions describing ongoing efforts to expand compatible vehicle and equipment coverage and to offer customers multiple participation pathways as programs mature.

From a utility implementation perspective, maintaining authorized pathways is important to ensure reliable controls, customer consent, and high-quality data streams that utilities can rely on for planning and operational use cases over time. As the number of authorized options expands, it also creates opportunities to improve program cost-effectiveness by reducing enrollment friction, improving retention, and increasing the ability to capture distribution-level value where it is highest. Accordingly, WeaveGrid supports proceeding with Charging Perks while these authorized pathways continue to expand.

## **IV. RECOMMENDATIONS**

For the reasons stated in these reply comments, WeaveGrid respectfully recommends that the Commission:

- Approve Charging Perks as a reasonable next step in Minnesota's managed charging portfolio, including the program's ability to support both bulk-system and distribution-level objectives as EV adoption increases;
- Support practical reporting and evaluation as the program is implemented and scaled to inform program refinements and improve the Company's ability to quantify and incorporate localized distribution deferral value into planning and avoided cost calculations over time.

## V. CONCLUSION

WeaveGrid appreciates the ongoing dialogue on transportation electrification in Minnesota. We look forward to continued engagement and thank the Commission for consideration of these comments.

Respectfully submitted,

WEAVE GRID, INC.

Sincerely,

/s/ Mathias Bell  
Vice President, Market Development and Partnerships  
WeaveGrid  
Phone: 612-979-6780  
Email: [mathias.bell@weavegrid.com](mailto:mathias.bell@weavegrid.com)