



560 Sixth Avenue North  
Minneapolis, MN 55411-4398

February 24, 2026

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

RE: Response to Xcel Energy's Reply Comments  
2025 INTEGRATED DISTRIBUTION PLAN  
DOCKET NO. E002/M-25-142

Dear Ms. Bergman,

Metro Transit appreciates Xcel Energy's efforts to reply to the initial comments from the various stakeholders, including Metro Transit and the Metropolitan Council, regarding their 2025 Transportation Electrification Plan (TEP). With this letter, we would like to continue to issue our support for the proposed consolidation of the previous EVSI pilots, implemented through previous TEP's into a single rebate-based program. Metro Transit would, however, like to offer the following responses to Xcel Energy's February 3, 2026 Reply Comments letter:

#### **II.D. Proposed Rebate Amounts**

Metro Transit appreciates Xcel's response to Electrify America and Metro Transit's request for a tiered rebate structure that would result in higher levels of compensation for larger fleets and location specific details. While we understand that this proposed structure may result in lengthier review and approval processes, we maintain that they would still offer major value and benefits to the community. Furthermore, we believe that they could be designed and developed in a manner that is cost effective and implementable. Electrifying large fleets and complex infrastructure locations already involve numerous extensive project review and approval processes. The proposed increased tiered rebate program could be integrated with these existing processes to not add considerable complexity to these projects and could be delivered in a cost-effective manner.

#### **II.F. Inclusion of Transit Bus Operators**

Metro Transit would like to thank Xcel Energy, the Clean Energy Groups, and the City of Minneapolis for their support of Metro Transit's comment that the eligibility for the School Bus Direct Current Fast Charging (DCFC) EVSE program should be expanded to include transit buses. As previously stated, transit buses face similar barriers with electrification and provide similar benefits to the community, including school transportation.

## **II.G. Eligibility Criteria for Enhanced Rebate Amounts**

In Metro Transit's initial reply comments to this docket, we requested that the definition of EJ areas be expanded to include areas within one mile of EJ areas, as defined in the MPCA EJ tool. Xcel responded to this comment by stating that requests to include "buffer zones" or introduce exceptions to EJ criteria will create confusion during the application process and may lead applicants to misunderstand rebate eligibility. Metro Transit respectfully disagrees with this position and believes that Xcel may have misunderstood our comment. Metro Transit is not asking for Xcel Energy, and other applicants, to complete any outside analysis to change the definition of the EJ areas, rather to use one of the filters in the existing MPCA mapping tool. The tool has a built-in feature to identify areas that are within one mile of EJ areas. To demonstrate the ease with which Xcel and applicants could review their eligibility we submit Figure 1 below as a screenshot of the MPCA mapping tool, with the filter for areas that are within one mile of EJ areas shown. The screenshot shows the use of the search function in the mapping tool to find Metro Transit's Heywood Garage and to determine that it is within one mile of an EJ area. This figure demonstrates that Metro Transit's proposed adjustment of definition for EJ areas as part of this rebate program will not result in any additional effort or outside analysis needing to be completed.

Additionally, Metro Transit would like to emphasize that if the definition of EJ areas for this rebate program is not adjusted to include areas within one mile of EJ areas, three of Metro Transit's six bus garages would not qualify for EJ tiered rebates under this program. This was further detailed in our original response to the docket. As mentioned in our original comments, while these garages are not technically within EJ areas as currently defined, they are in very close proximity to those areas and provide major transit service within the EJ areas including dense population areas such as North and South Minneapolis. Therefore, encouraging the deployment of charging infrastructure in these areas will be of great benefit to EJ areas and their communities.

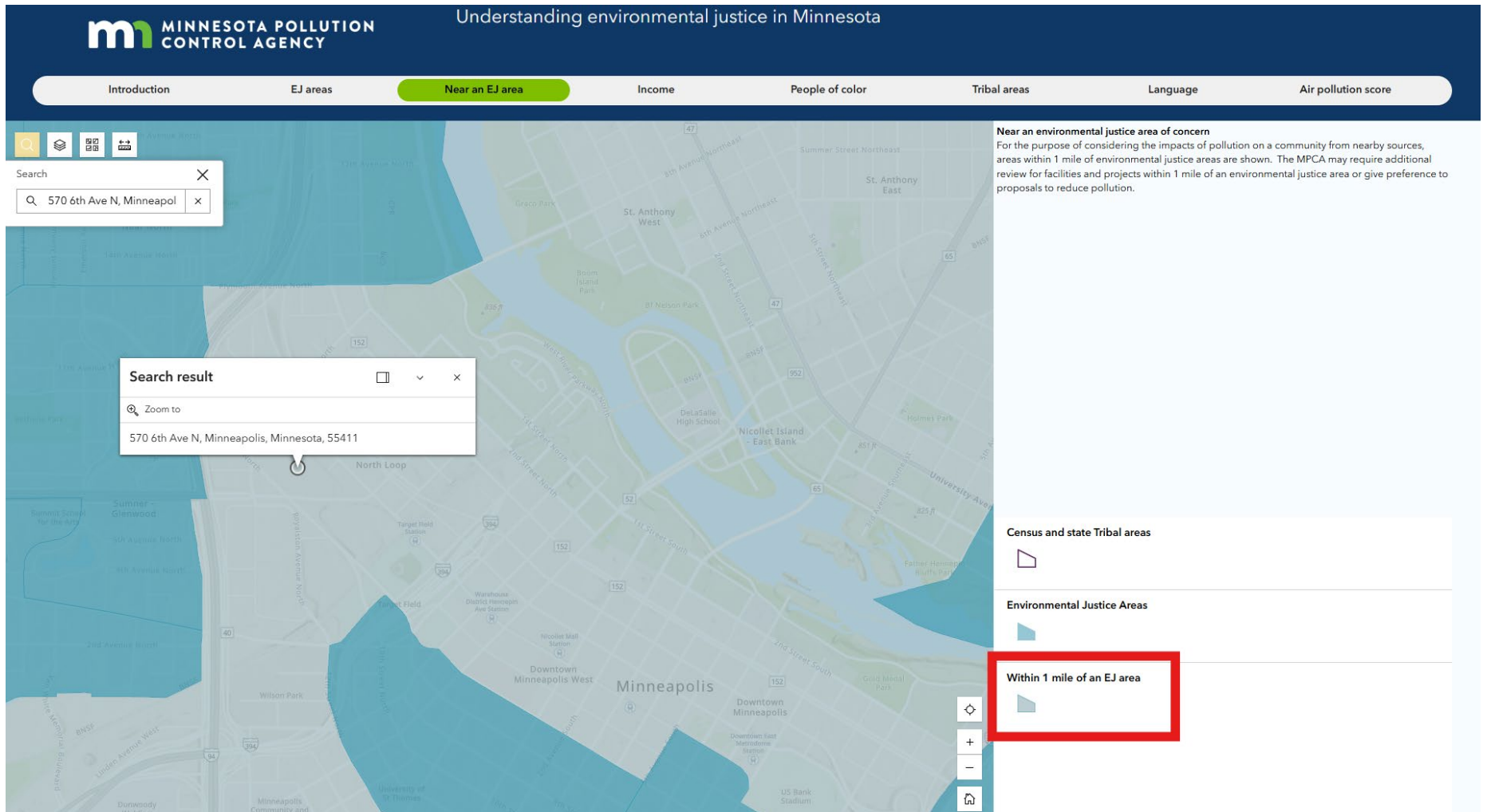


Figure 1 Screenshot of MPCA mapping tool showing areas within one mile of EJ areas



Metro Transit would again like to thank the PUC and Xcel Energy for their strong leadership in establishing a program to provide rebates to support transportation electrification. We further appreciate the opportunity to provide feedback regarding how dockets are evaluated. If there are any further questions or concerns regarding the Metro Transit electric bus program or related to our comments on the filings, PUC staff may contact Jim Harwood, Director Engineering and Construction at [James.Harwood@metrotransit.org](mailto:James.Harwood@metrotransit.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Harwood', written over a light gray rectangular background.

Jim Harwood  
Metro Transit Director Engineering & Construction

*Equal Opportunity Employer*