

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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April 2, 2025

RE: In the Matter of Minnesota Power's Supplemental Filing to its 2023 Transportation Electrification Plan
Docket No. E015/M-23-258

Reply Comments of Fresh Energy, Union of Concerned Scientists, Sierra Club, and Plug In America

Fresh Energy, Union of Concerned Scientists, Sierra Club, and Plug In America (collectively the Clean Energy Groups, or CEGs) submit these reply comments in response to Minnesota Power's [reply comments](#) filed on March 19, 2025. We appreciate the opportunity to participate in this docket.

The CEGs appreciate Minnesota Power's responses to our initial comments and commend the Company for stating an intention to modify their program in line with our proposed modifications. The CEGs continue to recommend the Commission approve Minnesota Power's Filing with the modifications recommended in our initial comments, specifically:

- Minnesota Power should, as a default arrangement, have site-hosts pass through the time-variant price signals on the underlying time-of-use rates to electric vehicle (EV) drivers.
- Minnesota Power should track both the EV charging installation costs and rates experienced by end-users as well as potential other impacts, such as rent increases at participating Multi-Dwelling Units (MDU)s.
- Minnesota Power should work with MDU owners, electricians, and trade groups to ensure that the program is accessible to MDUs without sufficient initial capital to finance the investments before rebate.
- Minnesota Power should reserve funds for at least one income-qualified MDU building per year and should have at least 12 port installations at MDUs per year.

Below, we respond to additional points raised by Minnesota Power in their reply comments.

A. Time-Based Rates

The CEGs appreciate that Minnesota Power was amenable to our initial request that their proposed Time-Based Rates¹ (i.e. time-varying electricity rates) should be passed through to customers by default. This modification will ensure that the program provides broad benefits to all ratepayers, regardless of whether they participate in the EV program.

Minnesota Power also agreed to track rates and fees charged to end-users by site hosts. Collecting these data will not only help track that the time-based rates are generally passed through to end-users, but should also allow the Commission and advocates to compare the MDU pilot's costs and rates to those enjoyed by residents of single-unit homes.

The CEGs are supportive of Minnesota Power's position regarding the use of Open Charge Point Protocol (OCPP) compliant chargers, noting that this will ensure that customers will be able to participate in future utility programs offering active-managed charging.

B. Incentive Caps and Budget Reservations

The CEGs believe that budget reservations will be an effective means to ensure that the proposed pilot program meets its intended goal of helping MDU residents more easily access the benefits of electric vehicle adoption. Although expanding public charging through the make-ready program will also help MDU residents electrify, the primary objective of the program should be to evaluate the costs and benefits of installing charging at MDUs.

In our Initial Comments, the CEGs recommended several minor modifications to the budget reservations in the Pilot Program we believe would help guide more investment into this side of the proposed pilot. Minnesota Power supported these modifications including reserving funds for at least one income-qualified MDU as well as 12 total charging ports per year.

We do not oppose raising the rebate limit from two chargers per MDU to three chargers per MDU as this will support larger MDUs in providing more charging ports and help Minnesota Power achieve the goal of 12 charging ports per year. However, we note that although the minimum number of participating MDUs per year is four, this should be seen as a floor and not

¹ This is the language used by Minnesota Power in their reply comments.

a ceiling. For example, the minimum goal of 12 charging ports per year could be achieved by selecting four MDUs and providing an average of three ports per MDU or by selecting six MDUs and providing an average of two ports per MDU. Overall, Minnesota Power should strive to provide access to MDU charging to as many interested drivers as possible.

The CEGs appreciate the discussion between the Department of Commerce and Minnesota Power regarding the relevance of public, workplace, and commercial fleet charging in complying with the relevant order to develop a program facilitating access to charging facilities for residents of multi-dwelling units. The CEGs continue to emphasize the important role that public charging plays in facilitating access to transportation electrification for residents of MDUs, particularly those who reside in buildings without access to off-street parking. By including public charging in close proximity to MDUs and testing levels of support for different segments,² the pilot will promote “the cost-effective adoption and integration of EVs,”³ as directed by the Commission.

The CEGs do not oppose the inclusion of commercial fleets in this pilot program, with a maximum budget reservation at one site per year. Charging infrastructure, including commercial-grade electric vehicle supply equipment that can serve residential vehicles, is generally the same infrastructure needed to serve light-duty fleet vehicles and some lower-mileage medium-duty fleets.⁴ Thus, from a charging technology perspective, infrastructure for those light- and medium-duty fleets can be compatible with the project categories and support levels outlined in Table 1 of Minnesota Power’s initial filing. The data and lessons generated from experience with light- and small medium-duty vehicle fleets can contribute to the overall goals of the program to the benefit of MDUs. For example, data on equipment and installation costs, developing arrangements for sharing chargers, or implementing load management may have transferrable teachings for charging at MDUs and public locations near MDUs. However, this pilot is poorly suited to address the needs of heavy-duty fleets, nor would data from heavy-duty fleets be likely to yield insights for MDU charging. Heavy-duty fleets require higher power levels (up to the megawatt level), in different configurations and locations than residential vehicles.⁵ Heavy-duty fleets, as well as independent owner/operators, will require a dedicated effort in a program tailored to their needs.

² In its reply comments, Minnesota Power agrees to test incentive levels, as suggested by the OAG in initial comments, see MP Reply Comments at 3.

³ In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure, Order Making Findings and Requiring Filings, February 1, 2019, Docket No. E-999/CI-17-879, at 11.

⁴ Wilson, Sam. 2025. “Ready for Work 2.0: On the Road to Clean Trucks.” Cambridge, MA: Union of Concerned Scientists. “<https://www.ucsusa.org/resources/ready-work-2>”

⁵ *Id.*

C. Evaluation Framework

The CEGs commend Minnesota Power's commitment to transparency regarding its evaluation framework. However, certain qualitative evaluation criteria remain opaque, such as how 'Make-up of renters vs. owners' will be used to determine eligibility or preference.⁶ The CEGs reiterate that Minnesota Power should clarify this in their tariff compliance filing.

D. Waiver of CIAC Requirement

The CEGs continue to recommend that the Commission waive the CIAC requirement for this pilot program. This policy is consistent with the policy approach taken by the Commission with respect to Xcel Energy's programs.⁷

E. Other Recommendations from Stakeholders

CEGs Comments:

The CEGs appreciate that Minnesota Power has accepted our other proposed actions that will help ensure the Pilot Program generates equitable investment in transportation electrification, such as working with trade groups, electricians, and the Minnesota Climate Innovation Finance Authority (MnCIFA) to further enhance access to this pilot program.

We understand that tracking rent in comparable multifamily buildings may go beyond the scope of feasibility for this Pilot Program. The CEGs will continue to monitor the extent to which investments in electric vehicle infrastructure in multi-dwelling units could yield the unintended consequence of raising rents beyond what would be expected, thus making housing less affordable for some residents. To help better understand this phenomenon, we continue to support Minnesota Power surveying rents for tenants in buildings participating in the program, as proposed in our initial comments and accepted by Minnesota Power.

Department of Commerce Comments:

On April 1, 2025 the Department of Commerce filed reply comments in response to Minnesota Power's reply comments. In these comments, the Department noted that the stated goal of the

⁶ Minnesota Power, December 2024. E015/M-23-258, "In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure" <https://www.edockets.state.mn.us/documents/%7B10EDE593-0000-CC15-A3BA-2C3279462988%7D/download?contentSequence=0&rowIndex=8> see Table 2 on page 16.

⁷ Minnesota Public Utilities Commission, July 2021, Docket No. E-002/M-20-711 "Order Approving Pilot Programs" <https://www.edockets.state.mn.us/documents/%7B9002687A-0000-C418-935D-B97C8739835C%7D/download?contentSequence=0&rowIndex=25>

Pilot Program to determine how to incent EV charging infrastructure installation is misaligned with the Commission requirement to encourage EV adoption.

Reports have shown that lack of at-home charging remains the most significant barrier to EV adoption for residents of multi-dwelling units.⁸ The CEGs support studying the connection between EV charging installation and EV adoption itself in the context of this pilot by monitoring the billed energy demand of the EV chargers installed under the Pilot, as suggested by MP in their initial comments,⁹ and by tracking the additional Program-level metrics proposed by the Department in section B.2 of their reply comments.¹⁰

Utility action to provide EV charging access for residents of MDUs in Minnesota Power's territory is overdue. Although the CEGs support additional safeguards to ensure that investments are appropriately targeted to maximize their impact, we oppose delaying the pilot to the next Transportation Electrification Plan process as suggested by the Department. We instead recommend that the Commission approve this pilot with recommended modifications.

F. Conclusion

We are at a pivotal moment in our efforts to address climate change and meet our state greenhouse gas reduction goals. As such, continued innovation and additional planning is required to meet the climate challenge and build swiftly towards an electrified and equitable clean energy future.

The CEGs appreciate Minnesota Power's ambitions to expand access to electric vehicle charging for residents of MDUs. We laud the attention to equity and hope that by taking our recommendations the program will bring widespread benefits to Minnesota Power's customers

The CEGs also thank the Commission for the opportunity to comment on Minnesota Power's proposed pilot program. The commission should approve the Pilot with the modifications proposed in our initial filing, including:

⁸ [The State Of Electric Vehicle Charging For Multifamily Housing • Energy Innovation](#)

⁹ Minnesota Power, December 2024. E015/M-23-258, "In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure" <https://www.edockets.state.mn.us/documents/%7B10EDE593-0000-CC15-A3BA-2C3279462988%7D/download?contentSequence=0&rowIndex=8> see page 21 under section F 'Evaluation'.

¹⁰ Department of Commerce, April 2025. E015/M-23-258, "Comments of the Department of Commerce" <https://www.edockets.state.mn.us/documents/%7B803DF395-0000-CF1C-A125-1A9CC07CEE42%7D/download?contentSequence=0&rowIndex=1> see page 6 under section B.2 'Program-level metrics'

- Minnesota Power should, as a default arrangement, have site-hosts pass through the time-variant price signals on the underlying time-of-use rates to EV drivers.
- Minnesota Power should track both the EV charging installation costs and rates experienced by end-users as well as potential other impacts, such as rent increases at participating MDUs.
- Minnesota Power should work with MDU owners, electricians, and trade groups to ensure that the program is accessible to MDUs without sufficient initial capital to finance the investments before rebate.
- Minnesota Power should reserve funds for at least one income-qualified MDU building per year and should have at least 12 port installations per year at MDUs.

We look forward to continued work with the Commission, Minnesota Power, and other stakeholders to support the growth of EVs in Minnesota in a manner that lowers barriers to EV adoption for all customers, supports an innovative and sustainable EV marketplace, and maximizes the environmental and grid benefits of transportation electrification.

Sincerely,

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CERTIFICATE OF SERVICE

I, Nicholas Haeg, hereby certify that I have this day, served a copy of the following document to the attached lists of persons by electronic filing and electronic mail.

Comments of Fresh Energy, Sierra Club, Union of Concerned Scientists, and Plug In America

Docket No. E015/M-23-258

Dated this 2nd day of April 2025

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