

October 24, 2022

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

**RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E002/M-18-643

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

In the Matter of Xcel Energy's Petition for Approval of Electric Vehicle Pilot Programs

The Petition was filed on September 23, 2022 by:

Holly Hinman  
Regulatory Manager  
Xcel Energy  
414 Nicollet Mall, 401 – 7<sup>th</sup> Floor  
Minneapolis, MN 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve Xcel Energy's petition as modified. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MATTHEW LANDI  
Rates Analyst

ML/ja  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-18-643

#### I. SUMMARY OF PETITION

The Minnesota Public Utilities Commission (Commission) approved two Xcel Energy (Xcel, or the Company) pilot programs in July 2019: its Fleet Electric Vehicle (EV) Pilot Service and Public Charging Infrastructure Pilots (together, the Pilot Programs).<sup>1</sup>

On August 2, 2022, Xcel submitted a Petition in Docket No. E002/M-22-432 for approval of a Public Charging Network, an Electric School Bus Pilot, and Program Modifications (EV Petition).<sup>2</sup> Part of the EV Petition was a request to modify the Company's Pilot Programs. On August 22, 2022, the Commission issued a Notice of Comment Period for the EV Petition seeking comment on the process the Commission should use to evaluate Xcel's EV Petition and proposed cost recovery method.<sup>3</sup>

On September 23, 2022, the Company filed a separate petition containing the Company's request to modify the Pilot Programs consistent with Minn. R. 7829.1300 (Modification Petition).<sup>4</sup> At the Commission's October 6, 2022 Agenda Meeting, the Commission decided that the EV Petition should be referred to the Office of Administrative Hearings (OAH) for a contested case proceeding subject to Minn. R. 7829.1000, with a report and recommendation from an Administrative Law Judge at the OAH due to the Commission by July 1, 2023.<sup>5</sup>

The Company's Modification Petition requested approval of two modifications to its Pilot Programs to bridge the gap between the end of the three-year pilot term and the Commission's final determination of the EV Petition (expected in mid-2023). The modifications requested are as follows:

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<sup>1</sup> *In the Matter of Xcel Energy's Petition for Approval of Electric Vehicle Pilot Programs*. Docket No. E002/M-18-643. ORDER APPROVING PILOTS WITH MODIFICATIONS, AUTHORIZING DEFERRED ACCOUNTING, AND SETTING REPORTING REQUIREMENTS. July 17, 2019. Accessed at:

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={D017016C-0000-CD10-8791-F2FF6B5C1546}&documentTitle=20197-154444-01>.

<sup>2</sup> Petition of Northern States Power Company for Approval of a Public Charging Network, an Electric School Bus Pilot, and Program Modifications (EV Petition). Docket No. E002/M-22-432. August 2, 2022. Accessed at (PUBLIC):

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={B0B25F82-0000-C42A-B36D-43C64B686B5A}&documentTitle=20228-188061-09>.

<sup>3</sup> Notice of Comment Period. *In the Matter of the Application of Northern States Power Company for Approval of a Public Charging Network, and Electric School Bus Pilot, and Program Modification*. Docket No. E002/M-22-432. August 22, 2022. Accessed at:

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={10ADC582-0000-C833-BBA6-BF1E7B737E21}&documentTitle=20228-188483-02>.

<sup>4</sup> Minn. R. 7829.1300. Accessed at: <https://www.revisor.mn.gov/rules/7829.1300/>.

<sup>5</sup> Verbal Commission Order. Docket No. E002/M-22-432. October 6, 2022. Written Commission Order forthcoming.

- Extend the terms of the Pilot Programs beyond their initial three-year terms; and
- Allow the Company to reallocate some or all the remaining Fleet EV Service Pilot dollars to the Public Charging Infrastructure Pilot if the Fleet EV Service Pilot funding is available and not in demand by eligible fleet customers.

The Commission did not issue a Notice of Comment on the Company's Modification Petition. Per Minn. R. 7829.1400, subp. 1, a person wishing to comment on a miscellaneous filing shall do so within 30 days of its filing with the Commission.<sup>6</sup>

## II. DEPARTMENT ANALYSIS

### A. *A SEPARATE MISCELLANEOUS PETITION WAS REQUIRED AND IS APPROPRIATE*

Per Minnesota Rule 7829.0100, Xcel's request to modify the Company's existing Pilot Programs in the EV Petition falls under the definition of a Miscellaneous Filing, which states in relevant part:

Subp. 11. **Miscellaneous filing.** "Miscellaneous filing" means a request or notice that does not require determination of a utility's revenue requirement.

A miscellaneous filing includes a filing involving a new service offering; a change in a utility's rates, services, terms, or conditions of service . . .

The Department concludes that Xcel appropriately filed its request to modify the Company's existing Pilot Programs in the EV Petition in a separate petition (the Modification Petition).

### B. *THE COMPANY'S FIRST REQUEST*

The Company's first request is to extend the term of the Pilot Programs beyond their initial three-year terms. This is separate from the Company's request to extend the Pilot Programs through 2026 as part of the EV Petition.<sup>7</sup>

The Company's Fleet EV Service Pilot program formally began in January 2020 and will expire in January 2023. The Company's Public Charging Infrastructure Pilot formally began in May 2020 and will expire in May 2023. Since the Commission recently referred the EV Petition to the OAH for a contested case proceeding, resolution of the EV Petition and the Company's requests for extending pilot operations through 2026 will not occur until after the Pilot Programs expire.

The Department agrees that a short extension of the Pilot Programs is reasonable as the Commission deliberates and considers the Company's broader request to extend the Pilot Programs through 2026.

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<sup>6</sup> Minn. R. 7829.1400, subp. 1. Accessed at: <https://www.revisor.mn.gov/rules/7829.1400/#rule.7829.1400.1>.

<sup>7</sup> EV Petition, at 59.

**The Department recommends that the Commission extend the Fleet EV Service Pilot Program and the Public Charging Infrastructure Pilot Program by one year from their current pilot period end dates of January 2023 and May 2023, respectively.**

*C. THE COMPANY'S SECOND REQUEST*

The Company's second request is to reallocate some or all the remaining Fleet EV Service Pilot dollars to the Public Charging Infrastructure Pilot if the Fleet EV Service Pilot funding is available and not in demand by eligible fleet customers.

The Company stated that the Public Charging Infrastructure Pilot has nearly exhausted the originally approved budget of \$9.2 million, and that approximately \$1.5 million of the \$14.4 million Fleet EV Service Pilot program budget will have been expended by the end of 2022.

The Company stated that it is still recruiting participants for both pilots: 11 site applications were in process for the Fleet EV Service Pilot and four sites have executed agreement and were in the design / construction phase; 45 applications were in process for the Public Charging Infrastructure Pilot and 32 sites have agreements and were in the design/construction phase.

It is currently unclear how the Company proposes to use any funds reallocated from the Fleet EV Service Pilot to the Public Charging Infrastructure Pilot, whether the Company needed additional funding to process the existing slate of applications (45) and the sites (32), nor what incremental impact additional funding may have on increasing participation in the Public Charging Infrastructure Pilot.

The Company's most recent annual report, filed June 1, 2022, yields some insight into the Company's Pilot Programs expenditures.<sup>8</sup> On a per-participant basis, the Company stated that it had spent about \$1.9 million on the Public Charging Infrastructure Pilot for 18 participants, which results in a cost of approximately \$105,000 per participant.<sup>9</sup> For the Fleet EV Service Pilot Program, the Company reported \$1,337,424 in spending for four participants, resulting in a cost of approximately \$334,000 per participant.<sup>10</sup>

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<sup>8</sup> Xcel Energy. *Compliance – Annual Report. Electric Vehicle (EV) Charging Tariffs, Programs, and Pilots. Docket Nos. E002/M-15-111, E002/M-17-817, E002/M-18-643, E002/M-19-186, E002/M-19-559, E002/M-20-711, E002/M-20-745, and E002/M-21-101.* June 1, 2022. Accessed at (PUBLIC):

<https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPopup&documentId={608D2481-0000-CF17-B4CB-B3DC903333AF}&documentTitle=20226-186302-11>.

<sup>9</sup> \$1.9 million / 18 participants = \$105,555 per participant.

<sup>10</sup> \$1,337,424 / 4 participants = \$334,356 per participant.

While this analysis is admittedly rudimentary, in the absence of more and better information from the Company,<sup>11</sup> it provides *some* indication on how much the Company is spending on a per participant basis for each pilot.

The Department is interested in increasing participating in both pilot programs, notably the Fleet EV Service Pilot. Given the limited participant in the Fleet EV Service Pilot in particular (four participants), the Department does not find it reasonable to potentially allocate all the remaining \$12.9 million of the budget to the Public Charging Infrastructure Pilot budget. Instead, there should be at least sufficient funding remaining in the Fleet EV Service Pilot program to fund the 11 site applications currently in process. Assuming a cost of \$334,000 per participant for the Fleet EV Service Pilot program, the amount the Company would need to fund each of the 11 site applications would be approximately \$3.674 million.

The Department is aware that this analysis could be informed by more and better information from the Company. The Department makes a preliminary recommendation below, but requests that the Company provides information in reply comments on how much of the remaining \$12.9 million of the Fleet EV Service Pilot program budget would be needed to ensure funding is available for each of the 11 site applications.

**The Department recommends that the Commission allow the Company to reallocate some of the remaining Fleet EV Service Pilot Program’s budget to the Public Charging Infrastructure Pilot Program, but require the Company to reserve enough of the remaining Fleet EV Service Pilot Program budget to provide funding for the 11 potential site applications currently in process.**

**The Department requests that Xcel provide in reply comments how much of the remaining \$12.9 million of the Fleet EV Service Pilot program budget would be needed to ensure funding available for each of the 11 site applications in process at the time the Modification Petition was submitted.**

### III. DEPARTMENT RECOMMENDATIONS

The Department makes the following recommendations:

- **The Department recommends that the Commission extend the Fleet EV Service Pilot Program and the Public Charging Infrastructure Pilot Program by one year from their current pilot period end dates of January 2023 and May 2023, respectively.**
- **The Department recommends that the Commission allow the Company to reallocate some of the remaining Fleet EV Service Pilot Program’s budget to the Public Charging Infrastructure Pilot Program, but require the Company to reserve enough of the remaining Fleet EV Service**

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<sup>11</sup> The Company’s June 1, 2022 Annual Report stated that, for the Public Charging Infrastructure Pilot, “cost per site information along with potential distribution system upgrade costs will be included in a future report once projects are placed in-service.” At 33. The Company did not indicate whether or when cost information on a per participant basis for the Fleet EV Service Pilot program would be made available at a future date.

**Pilot Program budget to provide funding for the 11 potential site applications currently in process.**

- **The Department requests that Xcel provide in reply comments how much of the remaining \$12.9 million of the Fleet EV Service Pilot program budget would be needed to ensure funding available for each of the 11 site applications in process at the time the Modification Petition was submitted.**

The Department is available for any questions that the Commission may have.

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce**  
**Comments**

**Docket No. E002/M-18-643**

Dated this **24<sup>th</sup>** day of **October 2022**

**/s/Sharon Ferguson**

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