

Date: October 16, 2020

RE.: Request for Comment on dockets E002/M-20-711, E002/M-20-745, and E002/M-18-643

To the Commissioners of the Minnesota Public Utilities Commission:

The City of Saint Paul, the shared-mobility non-profit HOURCAR, the transportation advocacy nonprofit East Metro Strong, and the American Lung Association Minnesota Chapter are members of a public-private partnership collaborating to create the [Twin Cities EV Community Mobility Network](#), a network of 70 charging hubs in the Twin Cities that will provide public charging and support a carsharing network of 150 electric vehicles. Half of the proposed infrastructure will be constructed in ACP50 neighborhoods (areas of concentrated poverty with greater than 50% people of color). HOURCAR, East Metro Strong, and the American Lung Association are also working on a separate multifamily pilot project that will place 50 shared electric vehicles at 25 Multi-Unit Dwellings (MDUs) in the greater Twin Cities region, with priority given to qualified low-income sites.

In response to the Public Utility Commission's Request for Comment on dockets E002/M-20-711, E002/M-20-745, and E002/M-18-643, issued September 25, 2020, we offer the following:

1. COVID-19 has had a very specific and detrimental effect on the Twin Cities EV mobility project that the Xcel Electric Vehicle Purchase Rebate program would potentially help to mitigate. When we created our project plan, we factored federal tax credits on some EV models into our budget. At the time, we were informed by our Sourcewell lessor that these credits could be monetized by the lending bank(s).

Unfortunately, as a result of COVID-19, banks now have significant losses to write off in 2020 and are uninterested in monetizing any tax credits. This unforeseen event has the effect of significantly increasing our costs, and may lead to cost-cutting measures such as reducing the number of EVs or foreshortening the term of the project. This in turn would potentially reduce the scope and impact of the project.

If the PUC authorizes the Xcel rebate program, this would have a material and very salutary effect on our project. It would enable us to keep the project within budget, and possibly even allow for the acquisition of additional electric vehicles. Given the project's focus of providing transportation solutions in low-wealth communities, this in turn would support resilience and recovery in these neighborhoods. We therefore support Xcel's petition in this regard.

We will be acquiring the vehicles in tranches beginning in early 2021 and continuing through mid-2022, so the sooner this program is approved, the more helpful it will be to our project.

2. HOURCAR, which will operate the carshare service for the Twin Cities EV mobility network, is also developing a project that will place shared electric vehicles at MDUs, with priority given to qualified low-income sites. This project recently received \$3 million from the US Department of Energy to cover electric vehicles and underwrite operational costs. If Xcel's Multi-Unit Dwelling EV Pilot is approved, HOURCAR and East Metro Strong plan to work closely with Xcel to identify sites where installation of shared electric vehicles would complement EVSE installed under the MDU project, especially low-income sites where transit access is poor or non-existent.

Providing EVSE and shared electric vehicles at MDU sites will enable access to the benefits of EV technology for people who either cannot afford to own an EV or do not own a vehicle for other reasons but would like access to a flexible shared vehicle when they need one. Availability of shared electric vehicles in MDUs, especially low-income sites, helps resolve the “chicken and egg dilemma” faced by landlords by ensuring some EVSE are used right away, and provides potential EV purchasers with a robust “try before you buy” option, facilitating adoption of the technology.

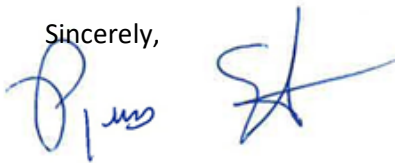
Without PUC approval of Xcel’s MDU project, it is unlikely this project could move forward. Potential site hosts, especially low-income sites, might balk at the upfront cost of EVSE installation. By approving Xcel’s petition, the PUC will help to make the benefits of electric vehicles equitably available to Minnesotans who would otherwise be unlikely to have access to them. We therefore support Xcel’s MDU project.

Our plan has us putting the first shared electric vehicles for this program in service in late 2021/early 2022 with an initial tranche of low-income sites in order to maximize the subsidies we can offer (since funding expires at the end of 2023). Having final program approval in early 2021 will enable us to plan appropriately, and will support our recruitment efforts with potential site hosts.

The PUC displayed tremendous foresight in proactively requesting this package of proposals from Xcel. By approving Xcel’s petition, the PUC will be taking significant steps toward ensuring that infrastructure development and access to the benefits afforded by electric vehicles is equitably accessible by all ratepayers.

We appreciate your consideration of these comments.


Sincerely,

A handwritten signature in blue ink, appearing to read "Russ Stark".

Russ Stark
Chief Resilience Officer, City of Saint Paul

A handwritten signature in blue ink, appearing to read "C. Paul Schroeder".

Paul Schroeder
CEO, HOURCAR

A handwritten signature in blue ink, appearing to read "Will Schroeder".

Will Schroeder
Executive Director, East Metro Strong

A handwritten signature in blue ink, appearing to read "Jon Hunter".

Jon Hunter
Senior Director, Clean Air

American Lung Association