

July 21, 2022

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-19-337

Dear Mr. Seuffert:

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

Minnesota Power's Request to Extend its Commercial Electric Vehicle (EV) Rate Pilot

The Petition was filed on June 13, 2022 by:

Jess McCullough
Public Policy Advisor
Minnesota Power
30 West Superior Street
Duluth, MN 55802-2093

The Department recommends **that the Commission approve Minnesota Power's extension request** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Rates Analyst Coordinator

CTD/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/M-19-337

I. INTRODUCTION

On December 12, 2019, the Commission issued an Order approving Minnesota Power's EV Commercial Charging Rate Pilot, which provides a special rate for customers offering public EV charging or fleet operators charging EVs for a three-year pilot term. In its order, the Commission required that "within 30 months, Minnesota Power shall propose a program to replace its Electric Vehicle Commercial Charging Tariff Pilot Program."¹

On June 13, 2022, Minnesota Power submitted a compliance filing seeking to extend the pilot rate until a new program is finalized, and requested an extension for the filing data of a new program until January 31, 2024 due to limited customer participation during the initial months of the pilot as a result of the COVID-19 pandemic.

On June 23, 2022, Commission Staff issued a Notice of Comment Period (Notice) regarding whether the Commission should grant Minnesota Power's request to extend its Commercial Electric Vehicle (EV) Rate Pilot. The Notice established an initial comment due date of July 22, 2022.

In its December 12, 2019, order in the present proceeding, the Commission required Minnesota Power to file annual reports on December 12 throughout the duration of the pilot. Minnesota Power files annual reports for its other EV related programs (Dockets 15-120, 20-638, 21-257) annually on June 1. In its Notice, Commission Staff proposed adjusting the annual report due date for the current docket to June 1 to better align with other EV related reporting.

¹ Order Point 3, Dec 12, 2019 Order Approving Pilot with Modification, and Setting Reporting Requirements, Docket E015/19-337.

II. DEPARTMENT RESPONSE TO COMMISSION STAFF QUESTIONS

A. *SHOULD THE COMMISSION GRANT MINNESOTA POWER'S REQUEST TO EXTEND ITS COMMERCIAL EV RATE PILOT UNTIL A NEW PERMANENT OFFERING IS APPROVED? SHOULD THE COMMISSION EXTEND THE DEADLINE FOR FILING A PERMANENT COMMERCIAL EV RATE TO JANUARY 31, 2024?*

1. *MP's Request*

In its petition requesting an extension to file a permanent commercial EV charging project, MP noted due to limited customer participation and data over the first 25 months of the pilot, anticipated near-term changes in the market, and high satisfaction among those currently participating in the pilot rate, lowering proposal to extend the duration of the Pilot Program. Minnesota Power proposed to submit a permanent rate proposal on or before January 31, 2024.

2. *MP's December 2021 Compliance Filing*

On December 10, 2021, MP submitted its annual compliance filing for its EV commercial charging rate. The compliance filing included the data shown in Table 1 below.

Table 1: Data on MP's EV Commercial Charging Rate

	Fleet Charging	Public Charging
Number of Fleets	1	Not applicable
Number of Vehicles	7	Not applicable
Number of Charging Ports	8	40
Number of Site Hosts	1	9

As seen above, combined the fleet charging and public charging include 48 charging ports.

3. *Reasoning Behind Commission Requiring MP to Submit a New Tariff 30 Months After Commission Order*

The Commission's December 12, 2019 Order included the following discussion concerning how long the approved tariff should last:

The CEOs argue that participants should not have to wait three years or more to learn about Minnesota Power's long-term plans for serving charging stations. Instead, the CEOs favor concluding the pilot program in two years. According to the CEOs, the experience the utility will gain over the year, combined with its new metering and data management systems,

will provide a sufficient basis for developing tariffs to replace the pilot program. In contrast, ChargePoint recommends extending the pilot program to five years, and allowing customers to enroll on a rolling basis for up to one year. ChargePoint argues that a three-year pilot program may not provide sufficient rate stability to enable fleet managers to evaluate whether to make the necessary investments in electric vehicles and charging facilities. But these parties are united, and are joined by ZEF Energy, in emphasizing the importance of ensuring that some replacement tariffs take effect as soon as the pilot program ends. Otherwise, participants would face the risk of bearing the cost of the utility's General Service Demand Rates thereafter for running their charging facilities.

Minnesota Power agrees with ChargePoint on the merits of granting potential program participants the flexibility to join the pilot program at any point. But Minnesota Power opposes extending or curtailing the length of its pilot program, arguing that a three-year period will provide the appropriate amount of experience and data for developing more permeant rates going forward.

Having considered the parties' positions, the Commission will adopt a blended approach. The Commission will defer to Minnesota Power's preference to run its pilot program for a three-year period, and to avoid needlessly prolonging the program. However, the Commission will direct the utility to develop and file a replacement proposal within 30 months from the date of this order, rather than awaiting the program's completion. While the utility will lose the insights that several additional months of data might provide, this burden will be more than offset by the benefit of having at least six months to evaluate the new proposal and ensure that it is ready for timely implementation when the current program ends.

4. Department Discussion

The Department notes that this project was approved in December 2019, only months before the beginning of the COVID-19 pandemic IN March 2020.² Several utility EV programs have had slow starts, at least partly due to impacts of the pandemic. The Department believes it is reasonable to give Minnesota Power more time to attract additional participants to obtain valuable customer data and experience before the Company proposes a permanent rate proposal. Such a permanent offering

² Governor Walz declared a Peacetime Emergency in Executive Order 20-01 on March 16, 2020. Accessed at: https://mn.gov/governor/assets/EO%2020-01_tcm1055-422957.pdf.

should be based on robust data collected during the time of the pilot program offering and further based on robust analyses of that data. Indeed, before a new rate is proposed, the Department recommends that MP evaluate the rate and give stakeholders the chance to comment on the evaluation before MP proposes a permanent rate proposal.

In reply comments the Department recommends that the Company propose a date for proposing an evaluation.

While the Covid pandemic is very likely to have been a primary driver of the limited participation in the Commercial EV Rate Pilot program, the Department is interested in whether the Company has any other insights regarding the limited customer participation available at this time.

The Department recommends that the Company provide a narrative explanation of what barriers may exist to customer participation and any feedback received by participants and non-participants regarding such barriers.

The Department recommends that the Commission approve Minnesota Power's request to file a permanent Commercial EV Rate no later than January 31, 2024.

B. SHOULD THE COMMISSION MOVE THE DATE OF MINNESOTA POWER'S ANNUAL REPORT FROM DECEMBER 12 TO JUNE 1 TO ALIGN WITH OTHER EV ANNUAL REPORTING DEADLINES?

Yes. The Department agrees that it is reasonable for MP to file its annual report on June 1 of each year to align with other EV annual reporting deadlines so that all of the utilities' annual reports can be reviewed at the same time.

The Department recommends that the Commission move the date of the annual report for Minnesota Power's Commercial EV Rate Pilot program from December 12 to June 1, beginning with the annual report anticipated December 12, 2022.

C. SHOULD THE COMMISSION ESTABLISH A NEGATIVE CHECK OFF PROCESS FOR UNCONTESTED MODIFICATIONS BY DELEGATING AUTHORITY TO THE EXECUTIVE SECRETARY TO APPROVE, VIA NOTICE, MODIFICATIONS TO THE PILOT, IF NO STAKEHOLDER OR COMMISSION STAFF OBJECTS OR FILES NOTICE OF OBJECTION WITHIN 30 DAYS OF THE MODIFICATION FILING?

Yes. The Commission already approved a negative check off process for uncontested modifications for Xcel's EV programs and the Department believes that a negative check off process for Minnesota Power's EV programs will improve administrative efficiency and the Company's ability to adapt to changing circumstances and leverage unique opportunities that may result in better programmatic and public policy outcomes with little to no risk to the public interest.

The Department recommends that the Commission establish a negative check off process for uncontested modifications to Minnesota Power's Commercial EV Rate Pilot program by delegating authority to the Executive Secretary to approve, via Notice, modifications to the pilot, if no stakeholder or Commission Staff objects or files Notice of Objection within 30 days of the modification filing.

D. ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

No. The Department is not aware of any other issues or concerns related to MP's petition.

III. DEPARTMENT RECOMMENDATIONS

A. RECOMMENDATIONS FOR MINNESOTA POWER REPLY COMMENTS

In reply comments, the Department recommends that MP provide a timeline for evaluating the present Commercial EV Rate Pilot Program before proposing a permanent commercial EV rate.

Additionally in reply comments, the Department recommends that the Company provide a narrative explanation of what barriers may exist to customer participation and any feedback received by participants and non-participants regarding such barriers.

B. RECOMMENDATIONS FOR MP'S PROPOSAL

The Department recommends that the Commission approve:

- Minnesota Power's request to extend its Commercial EV Rate Pilot program until a new permanent offering is approved.
- Minnesota Power's request to file a permanent Commercial EV Rate no later than January 31, 2024.
- A negative check off process for uncontested modifications to Minnesota Power's EV programs by delegating authority to the Executive Secretary to approve, via notice, modifications to the pilot, if no stakeholder or Commission staff objects or files notice of objection within 30 days of the modification filing.

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. E015/M-19-337

Dated this **21st** day of **July 2022**

/s/Sharon Ferguson

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