

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

August, 02, 2022

**In the Matter of EV Commercial Charging
Rate Pilot Compliance Filing**

Docket No. E015/M-19-337

Initial Comments of Fresh Energy, and Union of Concerned Scientists

Fresh Energy, and Union of Concerned Scientists, (the Clean Energy Groups, or CEGs) submit these Initial Comments in response to the Commission's June 23, 2022 [Notice of Comment Period](#).

We have met with Minnesota Power and understand the need for these changes. We recommend the commission approves Minnesota Power's extension request.

1) RESPONSE TO COMMISSION STAFF QUESTIONS

1.1 Should the Commission grant Minnesota Power's request to extend its Commercial EV Rate Pilot until a new permanent offering is approved? Statement [Electric vehicles have tremendous potential to reduce greenhouse gas emissions]

Yes, the commission should grant Minnesota Power's request to extend it's Commercial EV Rate Pilot until a new permanent offering is approved

1.2 Should the Commission extend the deadline for filing a permanent Commercial EV Rate to January 21, 2024?

Yes, the commission should extend the deadline for filing a permanent Commercial EV Rate to January 21, 2024.

1.3 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 commission should move the date of Minnesota Power's annual report to align with other EV annual reporting deadlines.

1.4 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 should establish a negative check off process for uncontested modifications.

1.5 Are there other issues or concerns related to this matter?

No, we do not have any other issues or concerns related to this matter

Conclusion/Recommendation

We recommend the commission approves Minnesota Power's request for extension.

/s/ MK Anderson

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CERTIFICATE OF SERVICE

I, MK Anderson, 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.

Initial Comments of Fresh Energy, Union of Concerned Scientists

Docket No. E015/M-19-337

Dated this 2nd day of August 2022

/s/ MK Anderson

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