

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
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August 01, 2022

**In the Matter of a Commission Inquiry
into Electric Vehicle Charging and
Infrastructure**

Docket No. E999/CI-17-879

**In the Matter of Minnesota Power's 2021
Integrated Distribution System Plan**

Docket No. E015/M-21-390

Docket No. E017/M-21-612

**In the Matter of Distribution System
Planning for Otter Tail Power Company**

Docket No. E002/M-21-694

**In the Matter of Xcel Energy's 2021
Integrated Distribution System Plan**

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

Fresh Energy, Sierra Club, Union of Concerned Scientists, and Plug In America (the Clean Energy Groups, or CEGs) submit these Initial Comments in response to the Commission's July, 1 2022 [Notice of Comment Period](#).

Introduction

The Clean Energy Groups have been consistently involved in electric vehicle (EV) proceedings in Minnesota since the initial 17-879 docket was opened. We are submitting comments on this matter because we are intimately familiar with the process and reporting of the Transportation Electrification Plans (TEPs) and our work will be affected by this change.

We want to thank the Public Utilities Commission (Commission) staff for their proactive engagement in walking us through the proposed changes earlier this summer. We are grateful to share our response.

Response to Staff Questions

- 1. Should the Commission combine Minnesota Power, Otter Tail Power, and Xcel Energy's Transportation Electrification Plans (TEPs) with their Integrated Distribution Plans (IDPs)?*

While we support the streamlining of the process of reporting on EV data and programs for the sake of efficiency in regard to Commission staff time, we want to ensure a seamless transition for EV advocates to participate in the IDP proceedings moving forward. We appreciate and support that the TEPs have their own section in the IDP.

- 2. Are the staff-amended IDP filing requirements for Minnesota Power (Attachment A), Otter Tail Power (Attachment B), and Xcel Energy (Attachment C) accurate with the Commission's Orders in the TEP and IDP dockets?*

Yes, the staff amended IDP filing requirements seem to reflect our discussion with Commission staff as well as our understanding of the TEP order. We request one correction to the Attachment, summarized below, based on our discussion with Staff:

Correction in Attachment A, PG. 4, 22, C:

c. Number and capacity of known public access ~~public~~ direct current fast charging (DCFC) stations.

3. Should the Commission discontinue the requirement to file Transportation Electrification Plans biennially on June 1 in Docket 17-879, and instead require the utilities to file based on amended IDP filing requirements incorporating TEP topics starting with the November 1, 2023, IDPs?

While the IDP dockets will contain the full TEPs, we recommend filing a notice or similar document in Docket 17-879 on June 1, 2023 stating that TEPs have been moved to dockets 21-390, 21-612, 21-624 for Minnesota Power, Otter Tail Power, and Xcel Energy, respectively, and will be published November 1, 2023 and biennially thereafter.

Additionally, we recommend filing a notice or similar document in Docket 17-879 on November 1, 2023 when the IDP's that incorporate TEP requirements are filed and biennially thereafter.

It is important to have a clear paper record for anyone who follows Minnesota EV utility developments. Given how central Docket 17-879 has been for this, we would like to ensure those who follow these developments have a clear understanding of where this information is stored.

Furthermore, we recommend the EV Annual Reports be filed in Docket 17-879 moving forward given the nature of Docket 17-879 as a centralized EV docket. Absent this change we recommend filing a notice or similar document in Docket 17-879 when the EV Annual reports have been filed.

4. Are there other issues or concerns related to this matter?

While we understand the benefit of integrating the TEPs into the IDPs, we reiterate our desire to have a seamless transition for EV advocates to participate in the IDP proceedings moving forward, and support that the TEPs have their own section in the IDP. We also recommend that during the Commission agenda meetings, that the TEP portion is clearly demarcated and scheduled such that EV advocates may participate specifically in that portion of the agenda meeting, and know when it is happening, without needing to partake in the entire IDP proceeding.

Conclusion

We thank the Commission for the opportunity to share our feedback on the merging of the Transportation Electrification Plans with the Integrated Distribution Plans and recommend the following moving forward:

- 1) Make this transition as seamless as possible for EV advocates by:
 - a) Filing a notice or similar document in Docket 17-879 on June 1, 2023 stating that TEPs have been moved to Dockets 21-390, 21-612, 21-624 and will be published November 1, 2023 and biennially thereafter.
 - b) Filing a notice or similar document in Docket 17-879 on November 1, 2023 when the IDP's that incorporate TEP requirements are filed and biennially thereafter.
 - c) Continue to file EV annual reports in Docket 17-879 moving forward.
 - d) Clearly demarcating and scheduling the TEP portion of the IDP agenda meetings so that EV advocates may participate specifically in that proceeding, and know when it is happening, without needing to listen through the entire IDP proceeding.

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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, Sierra Club, Union of Concerned Scientists and Plug-In America

Docket No. E999/CI-17-879

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Dated this 1st day of August 2022

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