



414 Nicollet Mall
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August 1, 2022

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

—Via Electronic Filing—

RE: INITIAL COMMENTS
COMMISSION INQUIRY INTO ELECTRIC VEHICLE CHARGING AND
INFRASTRUCTURE AND XCEL ENERGY'S 2021 INTEGRATED DISTRIBUTION
SYSTEM PLAN
DOCKET NOS. E999/CI-17-879 AND E002/M-21-694

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this response to the Minnesota Public Utilities Commission's July 1, 2022 Notice of Comment Period regarding the potential of combining our Transportation Electrification Plan (TEP) and Integrated Distribution Plan (IDP) filings in the above-referenced dockets on an ongoing basis. In these comments, we briefly respond to the topics requested in the notice and note generally, we are supportive of combining the two reporting streams.

1. Should the Commission combine Minnesota Power, Otter Tail Power, and Xcel Energy's TEPs with their IDPs?

Yes, we believe it is reasonable to combine our TEP reporting into our biennial, full IDPs in odd-numbered years. Current IDP requirements already include some transportation electrification information. With continued growth in EVs and our EV programs – and the distribution work necessary to facilitate continued EV adoption, integrating the two reporting streams will provide interested parties with a single, comprehensive source of information.

We do note that by folding the TEP reports into our IDP filing schedule, the TEP report will move from a June 1 filing date to November 1. This will make the timing of the TEP slightly out of alignment with our annual EV reporting requirements in even-numbered years, which will continue to be filed annually on June 1. To the extent the EV annual report information overlaps with TEP report requirements, we would provide the June vintage EV annual report information in the IDP. We believe that updating those overlapping items with a few more months of information would not offer meaningful new insight, would create additional administrative work for the Company, and may cause confusion for parties using both reports.

2. Are the staff-amended IDP filing requirements for... Xcel Energy (Attachment C) accurate with the Commission's Orders in the TEP and IDP dockets?

We believe that the amended IDP filing requirements shown in Attachment C of the notice accurately reflect the IDP and TEP reporting requirements previously ordered by the Commission. We do not have any changes to propose to the requirements themselves. However, Order Point 8 of the Commission's December 12, 2019 Order in Docket No. E999/M-17-879 provided language for how the Company should handle reporting in the event they are unable to provide the information and data as requested. This language does not appear in the proposal here. We ask that the language below be added to cover situations where information is not available.

For any instance in which the utility is not able to provide the information and data, or it is not practicable to do so, the utility must (1) explain why it is unable to provide the information and data; and (2) make a reasonable effort to provide an approximation of the required information and data. If the utility is unable to provide an approximation of the required information and data, the utility must provide the reason or reasons and explain whether it will be possible to provide the required information and data in the future.

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?

Yes, we support filing the proposed combined filing starting November 1, 2023 to align with our current full IDP biennial filing schedule. We agree that the Commission should discontinue the requirement to file standalone TEPs each June 1.

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

We do not have any other issues to discuss in these comments.

Pursuant to Minn. Stat. § 216.17, Subd. 3, we have electronically filed this document with the Minnesota Public Utilities Commission, and a copy of the Summary of Filing has been served on the parties on the attached service lists. Please contact Carl Cronin at carl.cronin@xcelenergy.com or (612) 215-4669 if you have any questions regarding this filing.

SINCERELY,

/s/

HOLLY HINMAN
REGULATORY MANAGER

Enclosures
c: Service List

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

Docket No. E999/CI-17-879 AND E002/M-21-694

Dated this 1st day of August 2022

/s/

Christine Schwartz
Regulatory Administrator

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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