



August 1, 2022

**VIA E-FILING**

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

Re: In the Matter of Minnesota Power's 2021  
Integrated Distribution Plan  
**Docket No. E-015/M-21-390**

In the Matter of a Commission Inquiry into  
Electric Vehicle Charging and Infrastructure  
**Docket No. E-999/CI-17-879**

Dear Mr. Seuffert:

Enclosed please find Minnesota Power's Initial Comments regarding incorporation of the Transportation Electrification Plan reporting requirements into the Integrated Distribution Plan.

If you have any questions regarding this filing, please feel free to contact me at (218) 428-9846 or [jmccullough@mnpower.com](mailto:jmccullough@mnpower.com).

Yours truly,

Jess McCullough  
Public Policy Advisor

JAM:th  
Attach.

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

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

**E015/M-21-390**

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

**E-999/CI-17-879  
INITIAL COMMENTS**

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**I. INTRODUCTION**

In its May 17, 2022, Order the Minnesota Public Utilities Commission ("Commission") delegated authority to the Executive Secretary to consult with utilities and stakeholders on procedural efficiency and timing for future transportation electrification plans. On July 1, 2022 the Commission issued a Notice of Comment Period ("Notice") on the topic of whether the Commission should combine Minnesota Power ("Company"), Otter Tail Power, and Xcel Energy's Transportation Electrification Plans ("TEP") with their respective Integrated Distribution Plans ("IDP").

The Company submits below responses to the Commission's four Topics Open for Comment.

**II. MINNESOTA POWER'S INITIAL COMMENTS**

In its July 1, 2022 Notice, the Commission requested that Minnesota utilities respond to the question: "Should the Commission combine Minnesota Power, Otter Tail Power, and Xcel Energy's Transportation Electrification Plans with their Integrated Distribution Plans?" The topics listed as Open for Comment and Minnesota Power's responses are listed below.

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

Minnesota Power greatly appreciates the opportunity to improve regulatory processes and ensure the Company is providing relevant information in an effective manner. Minnesota Power is supportive of combining the TEPs and IDPs to eliminate redundancy in reporting requirements.

- 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?**

The staff-amended IDP filing requirements for Minnesota Power (Attachment A) are accurate with the Commission's Orders in the TEP and IDP dockets.

- a. If proposing changes to the TEP/IDP filing requirements, please provide red-line text of any proposed modifications to the filing requirements with citation and rationale.**

The Company has no proposed changes to the TEP/IDP filing requirements. However, the Company would be interested in exploring a different filing date in the future, as November 1 coincides with other major filings and would relieve workload for both the Commission and the Department as well as the Company.

- 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. Minnesota Power is supportive of discontinuing the requirement to file TEPs biennially and instead consolidate reporting requirements into the next IDP filings.

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

Not at this time.

### **III. CONCLUSION**

Minnesota Power appreciates the inclusive approach the Commission is taking in this process, with a focus on streamlining reporting requirements, and is pleased to provide these comments in response to the Notice. The Company remains committed to meeting Commission and State goals related to transportation electrification and providing information requested by stakeholders and regulators in an efficient manner.

Dated: August 1, 2022

Respectfully,

A handwritten signature in black ink, appearing to read "Jess A. McCullough". The signature is fluid and cursive, with the first name "Jess" and last name "McCullough" clearly distinguishable.

Jess A. McCullough  
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Regulatory Affairs  
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jmccullough@mnpower.com

STATE OF MINNESOTA     )  
                                      ) ss  
COUNTY OF ST. LOUIS    )

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AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 1<sup>st</sup> day of August, 2022, she served Minnesota Power's Initial Comments in **Docket Nos. E-015/M-21-390 and E-999/M-17-879** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



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Tiana Heger