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December 20, 2023

Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

**Re: Docket No. E002/M-23-452. 2023 Integrated Distribution Plan.  
Northern States Power Company Transportation Electrification Plan.**

Dear Executive Secretary Seuffert:

SWTCH respectfully submits this feedback on Northern States Power Company's ("Xcel" or "the Company") 2023 Transportation Electrification Plan (TEP), filed in the above-named docket as Appendix H of the Company's Integrated Distribution Plan. Xcel has a critically important role to play to accelerating transportation electrification (TE) in Minnesota. The programs proposed by Xcel are an important step in the right direction, but do not go far enough to advance TE in an equitable way that aligns with state goals.

SWTCH encourages the Commission to consider additional pathways by Xcel to support deeper engagement across the transportation sector in Minnesota. In particular, strong and sustainable programs for multifamily customers — i.e. condominium and apartment building households — are critical for driving equitable EV charging outcomes. We believe this emphasis should be reflected both in any 2023 TEP programs approved by the Commission as well as in future supplemental filings.

## About SWTCH

SWTCH is a leading provider of electric vehicle (EV) charging and energy management solutions for multifamily, commercial, and workplace properties across North America. Our end-to-end solution optimizes EV charging usage and manages load to benefit drivers, property owners, and the grid. SWTCH has deployed more than 8,000 charging stations across North America, with a particular focus on ensuring equitable access to EV charging. SWTCH's charging management platform is built upon a foundation of open communication standards and interoperability to ensure future flexibility, scalability, and innovation even after purchase and installation.

## Introduction

Minnesota is a national leader when it comes to transportation electrification. The Public Utility Commission, the legislature, and executive branch agencies all have key roles to play to implement the policies and programs needed to drive adoption forward. The State's adoption of the Advanced Clean Cars I ZEV Program was a clear policy marker to set the state on a path towards an electrified transportation sector. However, EV policy goals are insufficient on their own without intentional and meaningful strategies and programs to ensure widespread access to charging infrastructure. Indeed, without a host of such complementary actions, the achievement of high-level EV goals is likely to fall short.

Utility incentives and programs tailored to the multifamily property sector are among these critically important complementary actions because this sector is a key but underserved segment when it comes to both EV adoption and EV charging. EV adoption by residents of apartments and condominium buildings is essential – both for the state to keep pace with its overall EV adoption targets, and to keep pace in an equitable way that shrinks the disparity between those who live in single-family homes and those who don't.

To ensure that multifamily households can fully benefit from EV adoption, they need access to at-home charging. Indeed, it's insufficient for multifamily residents to only have access to publicly available charging, such as nearby curbside charging or charging in public lots or garages. While such public charging does play an important role in the ecosystem, it does not allow drivers to enjoy either the convenience or often significant savings associated with charging one's vehicle overnight at home. Equity is about more than access; it is also about convenience and affordability.

This is why inclusion of a thoughtfully designed and appropriately scaled multifamily-focused strategy within Xcel's TEP matters.

## Comments

### 1. It is imperative for Xcel's TEP to address multifamily charging needs

Minnesota's transportation sector is quickly changing, and utility TE programs should be designed to both mitigate grid impacts and support state goals. As of November 2023, 47,682 EVs were on the road in Minnesota, up from 34,505 at the start of 2023.<sup>1</sup> The state has a goal to electrify 20% of all light duty vehicles on the road by 2030, a target shared by Xcel across its multistate service territory.<sup>2</sup> As this transition continues, ratepayer-funded programs are essential to ensure the transition is equitable.

A recent National Renewable Energy Laboratory (NREL) study estimates more than one million Level 2 ("L2") charging ports will be needed at multifamily properties and workplaces to achieve the national goal of 50% of new light-duty vehicle sales being zero-emission by 2030.<sup>3</sup> For Minnesota, in which about 20% of all housing units are found in multifamily dwellings, NREL estimates 6,200 multifamily ports will be needed by 2030.<sup>4,5</sup> SWITCH believes that the Company has an important role to play as a leader in the sector. Xcel is in many respects uniquely well positioned to ensure the transition to transportation electrification is equitable, and that benefits accrue across ratepayers and not just to early adopters. Adequate, sustainable investments in multifamily charging can support these outcomes.

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<sup>1</sup> November data from: <https://www.dot.state.mn.us/sustainability/electric-vehicle-dashboard.html>;  
January data from 2023 Minnesota Electric Vehicle Plan.

<sup>2</sup> Xcel 2023 Transportation Electrification Plan, p.1

<sup>3</sup> NREL. The 2030 National Charging Network, at Table 6. <https://www.nrel.gov/docs/fy23osti/85654.pdf>

<sup>4</sup> United States Census Bureau. American Community Survey. S2504. Physical Housing Characteristics for Occupied Housing Units.  
<https://data.census.gov/table?q=Housing&g=040XX00US08&y=2019&tid=ACSST1Y2019.S2504>

<sup>5</sup> NREL. The 2030 National Charging Network, at Table 8. <https://www.nrel.gov/docs/fy23osti/85654.pdf>

Xcel's 2023 TEP fails to include proposals to support charging deployment in multifamily dwellings. This is a glaring omission. Xcel put forward an ambitious TEP in August 2022 that included an expansion of programs serving multifamily dwellings. However, in June 2023, the Company filed to withdraw its proposal.<sup>6</sup> Since that time, the Commission has approved a narrow expansion of funding for Xcel's active Multi-Dwelling Unit EV Service Pilot.<sup>7</sup> This additional funding is intended for Xcel to meet commitments made to HOURCAR for 17 multifamily sites not covered in previous funding decisions.

SWTCH appreciates the efforts that Xcel has made to date to serve the multifamily segment, including a focus on innovative mechanisms for meeting the needs of low- and moderate-income communities. However, SWTCH is concerned by the failure to include support for charging at multifamily properties more broadly in the Company's TEP. Indeed, while narrowly-tailored multifamily pilot programs such as the HOURCAR rideshare program are beneficial for serving discrete underserved customers, the multifamily sector as a whole is itself an underserved market segment — one that warrants intentional and continued support.

Experience shows that a variety of approaches and incentives are needed to support charging at multifamily properties which have proven to be uniquely challenging. The multifamily property sector is diverse, with ownership structures ranging from rental apartments to condominiums to co-operatives. Even within a subset of one particular ownership model — such as condominiums — levels of interest and concerns about EV charging can vary greatly from one condo association to another. These different internal dynamics, combined with different physical and electrical constraints unique to each property, all contribute to a market environment that warrants broad and diverse multifamily programs and incentives.

For these reasons, SWTCH respectfully urges Xcel and the Commission to consider ways to include strategies such as make-ready incentives to bolster support for multifamily EV charging in the 2023 TEP. Without a more concerted effort to incentivize EV charging at properties of all types — notably apartment and condominium buildings — it is unlikely that Xcel's multifamily customers will benefit in any widespread or equitable manner.

## **2. Load management has an important role to play in multifamily applications and should be incentivized.**

The Company's proposal recognizes the critical value of load management for EV charging at residential properties. These same considerations should be extended into the commercial sector. Smart load management is the single most powerful tool available to manage energy demands from EV charging while minimizing the additional cost of electrical infrastructure upgrades. The absence of load management capability severely limits the number of chargers and/or the power level able to be delivered by those chargers.

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<sup>6</sup> Docket 22-432

<sup>7</sup> E-002/M-20-711 In the Matter of Xcel Energy's Petition for Approval of a Multi-Dwelling Unit Electric Vehicle Pilot Program.

EV charging load management can effectively reduce costs associated with electrical system upgrades while also managing everyday operating costs of EV chargers. As one example, SWTCH Control™ does exactly this by redistributing energy from peak hours (most commonly between 5pm and 10pm on weekdays) to quieter periods throughout the night and early morning – allowing more chargers to be installed while ensuring all EVs are charged and ready to go by morning. This functionality enables property owners to install more charging while limiting additional infrastructure costs. It also enables drivers to keep their transportation costs down.

Utilities in other jurisdictions have recognized the importance of a wide range of load management tools. In New York, for example, utilities recently launched a Load Management Technology Incentive Program that offers incentives for energy storage as well as advanced load management software and energy management systems.<sup>8</sup> The program also provides flexibility for other technologies that can effectively manage load to participate. Since the New York incentive is structured as a percentage of technology costs, it pushes participants toward lower-cost solutions that can achieve similar outcomes.

SWTCH recommends Xcel consider similar mechanisms to value a comprehensive set of tools for managing load specifically in multifamily settings.

**3. The 2024 Supplemental Plan should set a long-range vision for the role Xcel can play in meeting Minnesota’s transportation electrification goals, including serving the multifamily sector**

While Xcel does not propose a comprehensive suite of programs in its 2023 TEP, the Company notes that they intend to file a supplement in 2024, which will likely include a proposal to transition Fleet and Public Charging pilots into permanent programs. SWTCH supports a comprehensive TEP, and therefore strongly encourages the Company to include proposals across all categories, including multifamily.

The TEP should be a single source of vision and strategy for Xcel. A comprehensive process, in which all transportation electrification programs are considered under a single umbrella, will better ensure funding and resources flow to the sectors where they are needed most.

### In Closing

SWTCH is generally supportive of Xcel’s 2023 TEP but encourages the Commission to require Xcel to strengthen its TEP with more targeted incentives and load management strategies focused on the multifamily property sector.

SWTCH appreciates the work Xcel has done to move forward transportation electrification in Minnesota to date. We look forward to working with the Company, the Commission, and

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<sup>8</sup> State of New York Public Service Commission. Case 22-E-0236. Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Vehicles. Joint Utilities’ Electric Vehicle Load Management Technology Incentive Program.

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other stakeholders to appropriately scale and enhance Xcel's role in supporting the state's goals going forward.

If you have questions or if I can provide more information, please contact me at [josh.cohen@switchenergy.com](mailto:josh.cohen@switchenergy.com) or 202.998.7758.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Josh Cohen', with a long horizontal flourish extending to the right.

Josh Cohen  
Head of Policy