

December 20, 2023

HOURCAR is Minnesota's original nonprofit shared-mobility service. Since 2005, HOURCAR has been in the business of providing affordable, accessible, and sustainable transportation options to Minnesotans, particularly low-income communities and communities of color. HOURCAR currently operates the largest fleet of electric vehicles (200+) in the State of Minnesota.

In response to the Commission Notice of Comment Period, dated November 17, 2023 for Xcel Energy's Integrated Distribution Plan, HOURCAR respectfully submits the following comments which address questions 1, 4, and 8c related to Xcel's Transportation Electrification Plan (Appendix H of the Integrated Distribution Plan).

1. **Carshare Sponsorship:** We appreciate Xcel's inclusion of funding in the Education and Awareness portion of the TEP to "build upon successful sponsorship and event campaigns with HOURCAR to promote the Evie Carshare service" (pp. 70-71).

Evie Carshare, a partnership between HOURCAR and the cities of Saint Paul and Minneapolis, is part of the EV Spot Network, which features 70 charging stations supporting a fleet of 170 electric vehicles. In 2023 YTD:

- a. 3,500 unique users have taken over 115,000 trips spanning 1.2 million miles, double the number of trips and miles in 2022.
- b. 41% of total utilization came from BIPOC/non-white users (up from 38% in 2022) and 43% came from very low-income users with household income less than 50% of Area Median Income (AMI), up from 36% in 2022.

As Xcel notes, "The Company's sponsorship and event contributions help lower HOURCAR's costs, and thus, Evie Carshare pricing for low-income customers, generating greater awareness and access to electric transportation for disadvantaged communities." Commission support for Education and Awareness programs will help us further grow this already-successful program.

2. **MDU Pilot Update:** HOURCAR provides here an update for the Commission on HOURCAR's Multifamily Electric Vehicle Carshare Pilot Project (the "Multifamily EV Carshare Pilot"). There are currently six fully operational sites, all at affordable MDUs, featuring shared electric vehicles with dedicated chargers. To date in 2023, 560 unique users have taken over 2,500 trips spanning over 115,000 miles, with 44% of total utilization coming from BIPOC/non-white users, and 59% from very low-income users with household income less than 50% of AMI. Residents of affordable MDUs are benefiting from this clean, reliable, affordable transportation option.

The success of these initial sites highlights the need to bring more such sites online. In August-September 2023, the Commission approved budget for Xcel to fulfill its commitment to provide make-ready construction at 25 total sites to support shared electric vehicles as part of HOURCAR's Multifamily EV Carshare Pilot. Eight of these sites were characterized as "shovel ready" (i.e., fully contracted and in the design and construction phase). Because HOURCAR had already leased electric vehicles for use at these sites, the Commission expedited budget approval for these sites with a goal to complete all eight sites by the end of 2024. Construction for these eight sites has been much slower than expected. At this point, two sites are scheduled to be

completed in mid-Q1 2024, and the remaining 6 sites are scheduled for completion in Q2-Q3 2024.

3. **MDU Market Programs:** Xcel's proposal did not include bridge funding or successor programs to its Multi-Dwelling-Unit Electric Vehicle Service Pilot (the "MDU Charging Pilot"). Given the Commission's demonstrated interest in making the benefits of electrified transportation more widely accessible, especially for residents of affordable MDUs, this seems to us a gap. Since the Commission recently approved an additional budget for the current MDU pilot, this omission is perhaps understandable. A larger gap, however, is the absence of an action plan with concrete steps to get and keep the current MDU Pilot on track given the challenges reported in Xcel's Supplement to its annual EV compliance report submitted on June 30, 2023. We are encouraged that Xcel indicates in the TEP, "We are in the process of completing 35 projects in [the MDU] pilot and are looking forward to collecting learnings to help inform future program proposals for this unique residential customer segment" (p. 12 of the TEP).

We ask that the Commission continue to make access to the benefits of electrified transportation for low-income MDU residents a priority by:

- requiring Xcel to provide regular updates to the Commission on the status of the current MDU Pilot
- requiring Xcel to submit a plan for a successor to the current MDU Pilot, perhaps one narrowly focused on affordable MDUs.

HOURCAR supports approval of the TEP with these modifications. HOURCAR believes our proposed modifications are limited, would not unduly burden Xcel, and would continue to bring focus on equitable outcomes for all Xcel consumers.