



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

RE: 2023 Transportation Electrification Plan Docket No. E002/M-23-452

Mr. Seuffert

Fueling Minnesota is a trade association comprised of 400 members made up of mostly multigenerational family owned and operated small businesses as well as farm co-ops. We are submitting the below comments for the commission's consideration as they review Xcel Energy's 2023 Transportation Electrification Plan.

Before we address the topics presented to Xcel Energy, we would like to share with the commission the relationship between our Association and Xcel Energy which has been building over the past two years. Over those two years, we have worked hand in hand with Xcel Energy, other energy providers and legislative leaders in displaying our members' desire to be at the table and be the leaders in providing EV Charging at our traditional fuel retail locations. In a survey of our members in the Xcel service territory, we had over 100 retail sites come forward as willing locations to provide EV Charging services.

Fueling Minnesota understands that the future of transportation includes Electric Vehicles, and our members would provide the most convenient, safe, and reliable locations for this service. With our partnership with Xcel Energy, hopefully the PUC will agree that our members provide the most practical locations thereby removing any range anxiety consumers may have experienced with Electric Vehicles.

Fueling Minnesota would like to present the below comments to the Public Utilities Commission on Topic #8. Fueling Minnesota has presented to Xcel Energy, other utilities along with legislative leaders a plan of a public/private partnership. This partnership would involve an incentive rebate for our members to install level three fast chargers to help build out the network of charging locations. After the installation and rebate our members would become the sole owner and operator of the equipment. Our Association wants to make it clear, we in no way support a system in which the regulated utility is the owner or operator of the equipment. In our opinion, the best way forward is a public/private partnership.

The job tasked to you by the Legislature and the Governor is to protect ratepayers. Let us explain why we feel this public/private model is the best way to protect the ratepayer's investment:

1. A fuel retailer, regardless of what the fuel is, gasoline, diesel, electricity, has a duty to themselves, their employees and their customers to provide the product consumers desire. The model of a "hosted site" in our opinion fails. No entity takes responsibility for the operations and maintenance. That is unacceptable. If a traditional fuel "dispenser" fails, it's a disaster for the business and the consumer so the repairs are done immediately. If our presented rebate model were to be adopted our members would treat this new EV charging "dispenser" the same.
2. Furthermore, our members have spent the last 100 years building out the transportation refueling network. There is no range anxiety with liquid fuels. We have the best locations that provide safe, clean, and convenient locations that would let Electric Vehicles travel without range anxiety. Our eagerness to participate makes us an ideal partner as you look to develop this network.

Fueling Minnesota on behalf of our members submit these comments in hopes of providing the most cost effective and efficient model in providing the ratepayers a realistic model for effective EV Charging Network. We look forward to being a helpful partner in this transitional period.

Respectfully Submitted,

Tim Gross
Executive Director, Fueling Minnesota