



January 22, 2024

Via Electronic Filing

Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

Re: **Xcel Energy's 2023 Transportation Electrification Plan, E-002/M-23-452**

Dear Secretary Seuffert

Electrify America, LLC ("Electrify America") appreciates the opportunity to provide this reply comment regarding Northern States Power Company d/b/a Xcel's ("Xcel" or "the Company") Transportation Electrification Plan ("TEP") filed in this proceeding on November 1, 2023. Electrify America filed initial comments in this proceeding on December 20, 2023, and now files these limited reply comments.¹

Electrify America's Footprint

Electrify America, the largest open network of direct current fast charging (DCFC) stations in the U.S., is investing more than \$2 billion over 10 years in Zero Emission Vehicle infrastructure, education and access. This investment will enable millions of Americans to discover the benefits of electric driving and support the build-out of a nationwide network of ultra-fast community and highway chargers that are convenient and reliable. To date, Electrify America has built a coast-to-coast network of DCFC stations across over 850 locations and with nearly 4,000 individual DC fast chargers in total. Electrify America currently operates 6 DCFC stations with 34 DC fast chargers in Minnesota, and it has more DCFC stations currently under development within the state. These stations remain open to the public 24 hours a day for seven days a week, and are needed to unlock long distance travel across Minnesota and serve local communities that have not connected to Electrify America's network to date.

Public Charging Pilot

In initial comments, the Clean Energy Groups ("CEGs") recommended that the Commission approve bridge funding for the Public Charging Pilot Program, which provides make-ready funding for commercial public charging locations.² Xcel explains that it closed its Public Charging Pilot to new enrollment in the spring of 2023 due to its approved budget being fully allocated to both completed projects and those that are in the design and construction phase.³ Xcel now proposes bridge funding for its Public Charging Pilot and its Fleet EV Service Pilot in an amount of \$22.3 million for the years 2024

¹ Both sets of comments comply with the procedural schedule outlined in the Commissions' November 17, 2023 notice issued in this proceeding.

² Clean Energy Groups, Initial Comments of Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, Union of Concerned Scientists, Plug In America, and Environmental Law and Policy Center, at 17.

³ Xcel Energy, 2023 Integrated Distribution Plan - Appendix H ("2023 Transportation Electrification Plan"), MPUC Docket No. E002/M-23-452 (Nov 1, 2023) pp. 65-66, Appendix H.



and 2025. This includes \$17.3 million in capital expenditures and \$5 million in O&M. As Xcel further explains that the budget is based on the existing pipeline of projects.⁴

Electrify America notes that the proposed bridge funding budget is presented as a combined amount for the Public Charging Pilot and the Fleet EV Service Pilot making it is unclear as to how much of the budget may be dedicated to make ready for public charging stations. However, Electrify America supports the Commission's approval of a reasonable bridge funding amount for the Public Charging Pilot in 2024 and 2025 to the extent that such is necessary to ensure that there is consistent make-ready support available to commercial charging stations in the near term.

Managed Charging

In its initial comments, Switch opined that the Commission should ensure that Xcel addresses charging needs of multi-family residents, and that load management has an important role to play in multifamily applications and should be incentivized.⁵ Electrify America agrees that Xcel should address charging access for this group, including residents of apartments, townhouses, and other multi-unit dwellings ("MUDs").

It is important to ensure that any load management programs for DCFC stations recognize differences in charging segments. Switch cites the recent managed charging programs launched in New York as an exemplary managed charging program. It is worth noting that the New York Public Service Commission's order ("NY PSC") approving those managed charging programs recognized that public DCFC station loads are largely inelastic to price signals so DCFC stations may struggle to realize the financial relief intended by the program. As such, the NY PSC required that utilities offer a 50% demand charge rebate in addition and provide DCFC customers with the option of enrollment in the rebate or the managed charging program.⁶

Ensuring that MUD residents have access to public DCFC stations is crucial to continued success in Minnesota's transition to clean transportation, particularly for drivers in urban areas who may not have consistent access to home charging. Recent research from UCLA's Luskin Center shows that 43% of MUD residents rely on DC fast charging as their primary means of charging, nearly three times the percentage of non-MUD residents.⁷ While more than 80% of all charging sessions happen at home,⁸ in

⁴ 2023 Transportation Electrification Plan, p. 66.

⁵ Initial Comments of Switch, Docket No. E002/M-23-452, pp. 2-4 (Dec. 20, 2023).

⁶ NY PSC Final Order, Proceeding to Establish Alternatives to Traditional Demand-Based Rate Structures for Commercial Electric Vehicle Charging, Case No. 22-E-0236, pp. 20 (Jan. 19, 2023). (stating "*that managing charging demand is antithetical to public DCFC stations' core business model.*" and that, "[b]ecause public DCFC charging is not predictable, cannot be scheduled, and often cannot be managed without impacting the EV driving experience, public DCFC stations simply cannot be expected to manage their charging at this phase in the EV adoption cycle.").

⁷ DeShazo and Di Filippo, "Evaluating Multi-Unit Resident Charging Behavior at Direct Current Fast Chargers. UCLA Luskin Center for Innovation," pp. 3, 13, available at <https://innovation.luskin.ucla.edu/wp-content/uploads/2021/03/Evaluating-Multi-Unit-Resident-Charging-Behavior-at-Direct-Charging-Behavior-at-Direct-Current-Fast-ChargersCurrent-Fast-Chargers.pdf> (February 2021).

⁸ Hurlbut D., et al., "Electric Vehicle Charging Implications for Utility Ratemaking in Colorado," National Renewable Energy Laboratory, available at <https://www.nrel.gov/docs/fy19osti/73303.pdf>, first accessed on May 19, 2021.



urban areas there is greater difficulty charging because urban households are more than twice as likely as suburban households to be located in MUDs.⁹

Ensuring that demand charges do not pose barriers to public DCFC stations is a key part to providing equitable access to EV charging to MUD residents. Demand charges are the largest differentiating factor between effective electricity rates billed by the utility to residential customers and commercial customers. This inequity imposes greater costs on current and future Minnesota EV drivers in Minnesota who do not have easy access to off-street charging and, therefore, depend on public DCFC stations.

Conclusion

Electrify America appreciates the opportunity to submit these reply comments and respectfully requests that the Commission adopt the recommendations made in Electrify America's initial comment as well as this reply comment.

Respectfully submitted,

/s/ Anthony Willingham
Government Affairs & Public Policy Lead—State Government
Electrify America
1950 Opportunity Way
Suite 1500
Reston, VA 20190
Anthony.Willingham@electrifyamerica.com
(571) 786-9934

⁹ In fact, 37% of urban households and 16% of suburban households reside in MUDs. See Mortgage Bankers Association, "MBA Chart of Week: Distribution of Housing Types, Race and Ethnicity (Urban Areas and U.S.)," available at <https://newslink.mba.org/mba-newslinks/2017/october/mba-newslink-monday-10-2-17/mba-chart-of-week-distribution-of-housing-types-race-and-ethnicity-urban-areas-and-u-s/> (Oct. 2, 2017). Furthermore, 86% of the 31.4 million MUDs in the US are rented, and these residents have the greatest difficulty charging at home. See Neal N., Goodman, L., and Young, C., "Housing Supply Chartbook," Urban Institute (January 2020).