

February 22, 2024

ZEF Energy
323 North Washington Av, Suite 200
Minneapolis, MN 55401

PUC Docket: [23-452](#)

Dear Commissioners;

ZEF Energy is submitting these comments under MN PUC Docket No. 23-452 in relation to the Transportation Electrification Plan (TEP) submitted by Xcel Energy. We are submitting comments because we believe it is imperative that Xcel Energy is able to continue to provide comprehensive and low to no cost “make-ready” services to help enable the installation of important public electric vehicle infrastructure.

ZEF Energy Background

ZEF Energy is an electric vehicle (EV) charging solutions company that provides hardware, networking, load-management, and uptime operations and maintenance services. We are a Minnesota-based company that was established in 2014. We manufacture our own equipment in partnership with suppliers in Montevideo, MN and Wausau, WI and are dedicated to providing American-made solutions and supporting green-tech job growth in our home state of Minnesota. Today, ZEF Energy has over 5,000 chargers deployed across 40 states, with the most dense part of our network located in the Upper Midwest and in rural areas, an area of focus for ZEF Energy.

Project & Partner Context

ZEF Energy has worked diligently with communities, utilities, and local businesses to help bring EV charging to rural parts of the country where EV drivers have many barriers to traveling by EV. Our work includes working directly with customers, and at times applying for grant funds that can be leveraged by rural communities to build local charging stations. This work includes working with many stakeholders, educating an array of parties to be more familiar with EV charging technology, economic development benefits, utility rates, driver behavior and needs, and more.

Specifically, the Minnesota Pollution Control Agency administers VW Settlement funds in accordance with EV adoption and infrastructure plants created by the State and stakeholders. The *EV Fast-Charging Station Grants* program is one of these programs and ZEF Energy was awarded the opportunity to find and work with site hosts and local partners to develop (33) direct current (DC) fast charging sites across rural Minnesota. As such, ZEF is responsible for helping communities to take advantage of these funds to expand charging in the state.

Considerations

Access to charging and reliable charging is still the number one barrier to EV adoption in Minnesota and across the country. This is particularly true in rural areas of the state where route planning is essential and charging might not exist for over 100-150 miles. In these areas, existing and potential EV drivers — as well as cities, counties, utilities, and businesses such as hotels and destinations — know that lack of EV charging is a barrier to supporting more visitor travel, local purchase of EVs, and overall reduction of transportation emissions. Having charging in your community puts you “on the map” and brings drivers through your community where they will eat a meal, shop in local stores, and learn more about your community.

Due to the supply chain implications that still remain post-pandemic, the cost of equipment and transformers has increased about 30%. Additionally, labor costs continue to increase as skilled labor, such as electricians, are in shorter supply and greater demand. Developing a DC fast charging project can cost a total of \$130,000 or more. The VW grant funds cover only about 50% of these costs and to make these projects a viable option for interested communities, thus, support from the locally serving utility is very important. The support and cost-sharing brought through Xcel Energy’s Public Charging Infrastructure Pilot is what allows municipalities the opportunity to consider investing in these types of public benefit projects.

In working with many municipalities across the state, having project partners is vital to advancing a project successfully. Support from the local utility is often the most important partnership and in-sharing the cost, the local government entity is able to leverage limited funds that they have for the benefit of their community, but also the benefit of all current and future EV drivers traveling throughout Minnesota. **This infrastructure is essential for supporting adoption momentum in Minnesota and beyond. As such, ZEF Energy believes it is very important that Xcel Energy be granted the bridge funds needed to extend this program for public benefit projects such as these.**

Thank you for your consideration on these issues and understanding the need for extending the public charging infrastructure pilot that is currently on hold and unavailable to Xcel Energy communities.

Sincerely,


Megan Hoyer

Chief Development Officer
ZEF Energy