

December 20, 2023

RE: In the Matter of Xcel Energy's 2023 Transportation Electrification Plan

Docket No. E002/M-23-452

Dear Commissioners,

The Coalition for Clean Transportation requests to submit these Initial Comments in response to the Commission's November 17, 2023 Notice of Comment Period.

The Coalition for Clean Transportation brings together multiple organizations to help advocate and eliminate Minnesota's transportation-related climate emissions through the increased adoption and availability of sustainable and equitable electrification options. We center our work around environmental justice and ensuring the switch to electrify Minnesota's fleet of vehicles is as equitable as possible.

As a group of advocates working to support schools in electrifying their school bus fleets, we are pleased to see Xcel Energy's proposed Electric School Bus Demonstration and believe that utilities have a key role to play in supporting school bus electrification. Our group has been advocating for electric school buses in Minnesota for the past 3 years, by helping schools apply for funds to secure these buses through the U.S EPA's Clean School Bus Program and the Minnesota Pollution Control Agency's Volkswagen Settlement Program. We were also pivotal in advocating and helping get the state's first state-funded program for electric school buses last legislative session, which will be deployed through the Department of Commerce.

Electric buses emit zero tailpipe emissions, which can significantly reduce air pollution and improve air quality around schools and in surrounding communities. Deployment of electric school buses not only mitigates the effects of climate change, it also reduces the risks and health impacts related to air pollution, improving the quality of life for our children and students.

Exposure to diesel emissions can be especially harmful for children with asthma. Electric school buses eliminate a major source of exposure to harmful diesel exhaust fumes, which can cause respiratory problems and aggravate asthma and other respiratory conditions, improving the health of students, drivers, and community members. In addition to improving respiratory health, [studies](#) have demonstrated that switching from diesel to electric school buses can improve students' academic performance.

Electric school buses can also help Minnesota remain resilient as we switch to renewable energy. The University of Minnesota Duluth electrical engineering instructor [Scott Norr provided insight in this article](#) that electric school bus batteries can be used to help balance variations of solar generation as solar energy and additional renewable energy resources expands throughout the state. “Utilities such as Xcel also have demand response programs that allow them to drop power to customers who agree to participate and in return for less expensive electricity. That might help restore some of the reserve margin.” Norr stated.

After reading through Xcel’s proposal, a few things stood out to us as places for growth or change. There are multiple federal and state electric school bus programs currently open (the EPA’s Rebate and Grant Clean School Program and the MPCA’s Volkswagen Settlement Funds being primary examples). Xcel should expand this demonstration so schools within Xcel Energy’s service territory that receive electric school buses from these other funding sources are eligible to participate alongside the Department of Commerce’s program, to make sure that this partnership between the school district and Xcel is well-funded and supported for both parties.

Additionally, we are asking that Xcel Energy propose more than two buses in this initial stage. Minnesota passed legislation in 2023 that [updated its climate goals](#) to reduce greenhouse gas emissions by 50% from 2005 levels by 2030, and achieve net-zero greenhouse gas emissions by 2050. This means that we need to accelerate the adoption of electric school buses and other electric vehicles to meet this goal. Two buses in this first phase of the pilot program also limits which school districts can benefit from this program. This initial number should be increased to *at least* ten (10) to ensure the opportunity for electric school buses is equitably distributed throughout the Xcel Energy’s service territory.

Finally, we suggest that Xcel harmonize your Equity and Accessibility Category to match the Department of Commerce’s prioritization criteria to be used in rolling out its \$13 million electric school bus grant program, rather than going with Xcel’s separate equity prioritization. These prioritization requirements for the Department of Commerce are as follows:

1. A school district listed in the Small Area Income and Poverty Estimates (SAIPE) School District Estimates as having 7.5 percent or more students living in poverty based on the most recent decennial United States census.
2. A school district identified with local codes “43-Rural: Remote” and “42-Rural: Distant” by the National Center for Education Statistics.
3. A school district funded by the Bureau of Indian Affairs or a school district that receives basic support payments under the United States Code for children who reside on Indian Land.

This way both of the programs are aligned with one another, and also are as equitable as possible so as Xcel's program expands, more school districts are eligible to apply and get the support they need to run an electric school bus.

In conclusion, we make the following recommendations:

- (1) Require Xcel Energy to expand the demonstration program so that schools that receive electric school buses from other funding sources (e.g. EPA Clean School Bus Program, or MPCA Volkswagen Settlement Funds) are eligible to participate;
- (2) Require Xcel Energy to propose more than two buses in this initial stage, instead to increase this number to at least 10 electric school buses to equitably distribute this pilot program and to better match the scale at which we need to electrify our on-road vehicles to meet our state's climate goals; and
- (3) Require Xcel Energy to modify the Equity and Accessibility Category to match the Department of Commerce \$13M Electric School Bus Grant Program prioritization criteria to ensure that Xcel's pilot program is as equitable as possible.

In conclusion, we thank you for your time in hearing our perspectives and considering our recommendations.

Sincerely,

Coalition for Clean Transportation member organizations

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CCT organizes and advocates to eliminate Minnesota's transportation-related climate emissions through the increased adoption and availability of sustainable and equitable electrification options, centering BIPOC and under-resourced communities who disproportionately bear the impact of climate change, air pollution, and experience high rates of mobility injustice. CCT envisions a future where all Minnesotans, from urban to suburban to rural, have equitable access to clean transportation options that promote health and connection for all.

