

Revised Decision Options – Xcel Transportation Electrification Plan (23-452)

The Department, OAG, CEGs, and Xcel sent preferred decision options. Where there are changes from the initial briefing papers in support, staff has noted it in (red underline).

Electrify America and the Clean Energy Groups filed amended and new decision options.

- Electrify America filed modifications to Decision Options 4c and 5
- The Clean Energy Groups offered two new decision options, listed below as “NEW CEG” and 4.h. They offered amendments to Decision Option 7 and 4.f.

Staff notes two inadvertent mistakes that have been corrected below.

- Decision Option 13 was identical to Decision Option 12, this was an error on Staff’s part. Decision Option 13 should read: Require Xcel Energy to recalculate the Off-Peak energy rate using the existing TOD off-peak rate price of \$0.05171. This is consistent with Staff’s analysis in the briefing papers.
- Above Decision Option 4 Staff noted if the Commission selects DO 4c, it should not select DO 7. This should have read **DO 5** instead of DO 7.

Decision Options

The Commission should select 1, 2, or 3. Staff recommends selecting 2.

1. Approve Xcel Energy’s Transportation Electrification Plan (Xcel, HOURCAR).
2. Approve Xcel Energy’s Transportation Electrification Plan with modifications. (Department, OAG, CEG)
3. Reject Xcel Energy’s Transportation Electrification Plan.

The Commission may select any combination of 4 through 7. For 4, it may select any combination of subparts. If the Commission selects 4c, it should not select 5 ~~7~~.

4. Require Xcel Energy to include the following components in its next Transportation Electrification Plan:
 - a. A proposal to actively manage electric vehicle charging. (OAG, ev.energy, WeaveGrid, CEG, SWITCH, Department)
 - b. A proposal for a successor to the current MDU Pilot. (HOURCAR, SWITCH, CEG, Department)
 - c. A modification to its A15 and A14 rates changing the demand charge limiter for electric vehicle charging stations to 175 hours. (Staff alternative to Electrify America, Department, CEG)
 - d. Streetside charging near high concentrations of multi-dwelling units and/or renters. (CEG, Department)
 - e. An additional offering for heavy-duty electric vehicles. (CEG, Department)

- f. A robust discussion of equity, including analysis on how Xcel's EV programs are serving those disproportionately impacted by transportation pollution, as well as renters, multifamily housing residents, communities of color, "low to moderate" income customers, and rural communities; and what gaps may remain. (CEG, Department, HOURCAR)
- g. Discussion of intra-Company coordination between electric vehicle, energy efficiency, and building electrification planning, including, for example, ECO programs. (CEG, Department, HOURCAR)
- h. Discussion on how the Company is supporting adoption of electric school buses, beyond its V2G Demonstration Project, including if EVSE rebates were offered under ECO; how Xcel is mitigating and streamlining interconnection; and how Xcel is promoting or educating school bus operators and/or school districts on the availability of electric school bus funding. (CEG)

NEW CEG: Require Xcel Energy to convene interested parties ahead of the next TEP filing to review MDU EV Service pilot data and discuss its successor program, ideally soon after the pilot data is released and no later than August 2025. At minimum, the interested parties should include those who were convened ahead of the MDU EV Service pilot. (CEG)

- 5. Modify the Company's A15 and A14 rates demand charge limiter to read:
For public DCFC stations only, the following demand charge limiter shall apply:

In no month shall the on peak billing demand be greater than the value in kW determined by dividing the kWh sales for the billing month by ~~100~~175 hours per month.

(Electrify America, EVgo, Tesla)

- 6. Delegate authority to the Executive Secretary to convene a working group to discuss the development and design of PIMs for Xcel's EV Programs, with the working group to produce recommendations prior to Xcel's supplemental filing(s) in which a pilot is transitioned to a permanent program. (CEG)
- 7. Require Xcel Energy to file its next Transportation Electrification Plan on November 1, 2025. (Staff proposal, Xcel, CEG)
 - a. Require Xcel Energy to convene interested parties at least 3 months before this filing, to review and provide input into Xcel's Transportation Electrification Plan. (CEG)

Subscription Pilot Transition

The Commission should select Decision Option 8 to approve the subscription pilot transition. It may then select some or all of the subparts to 8.

8. Approve Xcel's proposal to transition its subscription-service pilot to a permanent offering with the following modifications. (Department, Xcel, OAG, CEG)
 - a. Require Xcel to include an optional, add-on subscription tier for drivers wishing to charge more than 1,000 kWh off-peak. (CEG)
 - b. Require a quarterly compliance filing to notify the Commission if the difference between program costs and revenues is greater than 15%. (Department)
 - c. Approve the updated tariff sheets in Section No. 5 of Xcel's Electric Rate Book. (Department, [Xcel](#))
 - d. Grant Xcel a variance to Minn. R. 7820.3200, .3400, .3700, and .3800, and a waiver to relevant portions of Section 3 of Xcel's Electric Rate Book Section 6 tariff. (Department, [Xcel](#))
 - e. Require Xcel to remove aircraft from the definition of "electric vehicle" in its EV Accelerate at Home offerings. (OAG, Xcel)
 - f. Require Xcel to remove the provision for three-phase service in its EV Accelerate at Home offerings. (OAG)
 - g. Require Xcel to make a compliance filing with the source for the values used to calculate the fuel clause rider for the standard and renewable options. (Staff Proposal, [Department, Xcel](#))
 - h. Require Xcel to update the monthly subscription price as changes to riders are approved. (Staff proposal, [Department, Xcel](#))
 - i. Require Xcel to make an annual update to the monthly subscription price on _____ to incorporate current pricing for the fuel clause and Renewable*Connect. (Staff proposal, [Department, Xcel](#))

If the Subscription program is approved, the Commission should choose 9. It may choose 10 and/or 11.

9. Approve Xcel's proposed accounting treatment and cost recovery mechanism. (Xcel, [Department](#))
10. Require the Company to prove any O&M costs are incremental to those approved in the rate case prior to allowing cost recovery. (Department)
11. Require the Company to track the EV charging equipment assets in a separate subaccount and show overall revenues exceed overall costs, including the WACC return. (Department, [CEG](#))

Staff recommends the Commission choose either 12 or 13.

12. Require Xcel to use the EVAAH three-part Time-of-Use rate for the Subscription Option. Require Xcel to file updated tariff sheets reflecting these changes within 30 days of the Commission's order. (Staff proposal, [Department](#))

OR

13. Require Xcel Energy to recalculate the Off-Peak energy rate using the existing TOD off-peak rate price of \$0.05171. (Staff proposal)

If the Subscription program is approved, the Commission should choose 14.

14. Require Xcel to report on the following items in its EV Annual Reports. (Xcel, Department, CEG)
- a. Participation information:
 - i. number of participants
 - ii. number selecting each type of equipment
 - iii. number choosing Windsource or another renewable energy rate offering and the number choosing standard rates
 - iv. number of participants and/or charging ports that reside in EJ areas (CEG, Department, Xcel)
 - v. an estimate how many participants are likely renters (CEG, Department, Xcel)
 - b. kWh consumption details on a per month basis, including:
 - i. kWh consumed in the on-peak period
 - ii. kWh consumed in the off-peak period
 - iii. comparison of actual consumption to estimated amounts
 - iv. highest and lowest usage customer in each month
 - c. Costs and revenues associated with each service option including the amount of metering equipment added to rate base and whether the pilot is revenue neutral.
 - d. Insights drawn from customer experience and program performance under the Company's safety and reliability standards.
 - e. Any problems encountered connecting to the homeowner's wireless internet connection.

Home Wiring Rebate Program

The Commission may choose 15, 16, or 17 to approve or reject the pilot. If the Commission chooses 17 it will need to work through the remainder of decision options 18 through 30. If the Commission chooses 15 or 16 it can proceed to the next section.

15. Reject the Home Wiring Rebate Program. (OAG - preferred)
16. Deny the Home Wiring Rebate Program without prejudice and direct the Company to file it as a modification to its ECO triennial within 6 months of the Commission's Order. (Staff proposal, OAG - alternative)
17. Approve the Home Wiring Rebate Program with the modifications identified below. (CEG, Xcel, Department)

The Commission may choose 18 and/or 19.

18. Require Home Wiring rebate recipients to remain on a managed charging program for the duration of the pilot, provided they are at the same premise where the rebate was used. (CEG)
19. Ensure requirements and criteria for the Home Wiring Rebates are compatible with the state electric panel grant program and federal incentives and educate customers on the potential to convert multiple systems in their home to electric power. (CEG, [Department](#))

The Commission may select 20 to expand Enhanced Rebate eligibility, it may also select 21 or 22 if it wants to limit or disallow geographic eligibility for Enhanced Rebates.

20. Implement additional eligibility criteria for the Enhanced Rebates that aligns with the Department of Commerce's low-income eligibility for ECO programs. (CEG, Xcel, Department)
21. Limit geographic-based eligibility for the Enhanced Rebates to premises located within a Disproportionately Impacted Community (DIC), as defined and published by the White House Council on Environmental Quality's Justice40 Initiative. (Department)

OR

22. Limit eligibility for the Enhanced Rebates to income qualified customers. Use the Department of Commerce's low-income eligibility for ECO programs to determine rebate eligibility. (OAG, if approved)

If the Commission approves the Home Wiring Rebate Program, it must choose 23 or 24. If the Commission chooses 24, it must choose 25 or 26. The Commission may also choose 27 and/or 28

23. Approve Xcel's request to establish a regulatory asset for its Home Wiring rebates and set the rate of return at the Company's WACC. (Xcel)
24. Reject Xcel's request to establish a regulatory asset for its Home Wiring rebates and set the rate of return at the Company's WACC. (OAG, if approved, Department)
25. Require the Company to expense Home Wiring rebates in the year they are incurred. (OAG, if approved)
26. Require the Company to propose an amortization or tracker-like mechanism with short term and long-term debt to recover the costs of the Home Wiring rebates. (Department)
27. Require the Company to prove any O&M costs are incremental to those approved in the rate case prior to allowing cost recovery. (Department)

28. Cap annual Home Wiring Rebate expenditures at the following levels:

2024	2025	2026	2027
\$0.5 million	\$0.8 million	\$1.2 million	\$1.7 million

(OAG, if approved)

If the Commission approves the program, it should choose both 29 and 30.

29. Require Xcel to file tariff pages, including the Customer Service Terms and Conditions, for the proposed Home Wiring Rebate Program. (Department, if program approved, [Xcel](#))

30. Approve the reporting requirements listed below relating to the Home Wiring Rebate Pilot. (Department, [Xcel](#), [CEG](#))

- a. Number of Market rebates administered.
- b. Number of Enhanced rebates administered.
- c. Total number of all rebates administered.
- d. Total value of Market rebates administered.
- e. Total value of Enhanced rebates administered, and percent of the total value of all rebates administered.
- f. Percentage of rebate recipients of each type located in an Environmental Justice Area of Concern (EJ area) or Disproportionately Impacted Community.
- g. Total value of all rebates administered.
- h. Average cost and discussion of home wiring installations.
- i. Program expenditures.
- j. Home ownership and rentership across both the Market Rate and Enhanced Rebate recipients. ([CEG](#), [Department](#), [Xcel](#))

CIAC Waivers

The Commission must choose 31, 33, or 34. Staff notes that choosing 34 is in line with Staff's recommendation to defer a decision on CIAC to a broader consideration of cost allocation in the general IDP. If the Commission approves the CIAC waiver it may also select Decision Option 32

31. Approve Xcel Energy's proposed changes to add the following language to Section No. 5, Page Nos. 6, 7, 8, and 8.3 of its tariff:

Company waives CIAC requirements for residential customers under the Standard Installation and Extension Rules under Section 5.1 (A)(1)(a), Section 5.1(A)(2) and (3), and Section 5.2 of the General Rules and Regulations on Tariff Sheets No. 6-23 through 6- 27.

Approve adding similar language to Section No. 6, Page Nos. 23, 24, and 27. (Xcel, [CEG](#))

32. Require Xcel to track and report on the CIAC waivers granted to residential customers. (OAG, if approved)

33. Reject Xcel's proposed changes to its CIAC Tariff and require the Company to end its informal policy of waiving CIAC for EV customers on off-peak charging rates. (OAG)

34. Reject Xcel's proposed changes to its CIAC tariff without prejudice. (Staff proposal, [Department](#))

Residential Advisory Services

35. Approve Xcel Energy's proposed residential advisory services. (CEGs, Xcel, ev.energy, HOURCAR, [Department](#))
36. Require Xcel Energy to provide information in its EV Annual Reports on the use of any approved funding for Residential Advisory Services to provide appropriate visibility regarding the use and effectiveness of additional funding. (Department)

Electric School Bus V2G Demonstration

The Commission should select 37 or 38. If the Commission selects 37, it should select some combination of subparts a through m.

37. Approve the Electric School Bus V2G Demonstration with the following modifications: (CEG, [Xcel - no preferred modifications](#))
- a. Require the Company to expand the program to at least 10 installations. (CEG, CCT)
 - b. Direct the Company to apply for funding for the 8 additional V2G participants through ECO programming. (CEG)
 - c. Allow school bus operators that otherwise have or are willing to pay for their own charging infrastructure to participate in power export opportunities. (CEG)
 - d. Expand bus operator eligibility to include additional state and federal program grant recipients. (CEG)
 - e. Include payments or other price signals to participating school bus operators for V2G services provided. (CEG)
 - f. Require Xcel to compensate participating school bus operators for any energy discharged back to the grid as part of the demonstration program (Staff modification of CEG)
 - g. Follow the National EV Infrastructure (NEVI) Program standards set forth in the Code of Federal Regulations title 23, part 680 (sections 680.112 and 680.116) for quarterly data reporting. (CEG)
 - h. Require Xcel to use a third-party vendor to administer the pilot. (~~CEG~~)
 - i. Require Xcel to follow the Minnesota Distributed Energy Resource Interconnection Process (MN DIP) for vehicle to grid interconnections. (Staff modification of Department)
 - j. Modify the Equity and Accessibility Category to match the Department of Commerce's Electric School Bus Grant Program prioritization criteria. (CCT)
 - k. Require Xcel to file updated tariff pages and Vehicle-to-Grid (V2G) addendum to the Fleet EV Service Pilot for the proposed Electric School Bus Demonstration. (Department, if the program is approved)

- l. Require the Company to modify the V2G program to enable installation of EVSI through make-ready rebates. (Highland)
 - m. Waive the requirement for Contribution in Aid of Construction (CIAC) for any school bus charging requests for service in the Company's service area. (CEG)
38. Deny the Electric School Bus V2G Demonstration without prejudice and require Xcel Energy to re-propose it as a modification to the Company's current ECO triennial plan. (Department)

If the Commission approves the V2G Demonstration, it must choose either:

*39 and 41 **OR***

*40 and 41 **OR***

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39. Approve Xcel's request to establish a regulatory asset for the V2G EVSE rebates and set the rate of return at the Company's WACC. (Xcel)
40. Reject Xcel's request to establish a regulatory asset for the V2G EVSE rebates. (Department)
41. Approve Xcel's request to own and rate base the service connection and electric vehicle supply equipment for the V2G demonstration. (Xcel, Department)
42. Allow Xcel to own and operate the service connection EVSI, and V2G EVSE associated with the demonstration projects. Allow the Company to seek recovery for prudently incurred costs in a future rate case. (Staff alternative)

If the Commission approves the V2G Demonstration, it should approve 43. It may choose to include some or all of the additional subparts i through m recommended by the Department.

43. Approve the reporting requirements listed below in its EV Annual Reports. Require items with an asterisk (*) to be reported on a quarterly basis and filed with the quarterly reports in Docket 18-643/20-711. (Department, Xcel, CEG)
- a. Number of participating school districts, operators, buses, and locations (charging depots)*
 - b. Costs to provide service, broken out by project*
 - c. Average energy consumption (kWh) resulting from electric school bus charging, broken out by project
 - d. Total energy consumption (kWh) of the demonstration resulting from electric bus charging, and the percent of charging occurred during off-peak hours
 - e. Average energy demand (kW) resulting from e-bus charging, broken out by project
 - f. Number of V2G events conducted each summer and amount of energy benefitting the grid as a result
 - g. Percent of participants located in area of concern defined by the MPCA EJ screening tool*

- h. Overall participant satisfaction with the demonstration
- i. Monthly load shapes for the chargers showing periods of charging and discharging. (Department, [CEG](#))
- j. Data on any local congestion patterns around times of charging and discharging in the reasonable vicinity of the EVSE. (Department, [CEG](#))
- k. Data on system load shape in the reasonable vicinity of the EVSE. (Department, [CEG](#))
- l. Data on any local renewable generation, if any, around times of charging and discharging in the reasonable vicinity of the EVSE. (Department, [CEG](#))
- m. Data on amount of other load management resources in the reasonable vicinity of the chargers. (Department, [CEG](#))

Commercial EV Pilot Bridge

The Commission may choose either 44, 45, or 46. If the Commission chooses 44 or 46, it may choose 47 and/or 48. It should also choose 49 if the funding is approved.

- 44. Approve the proposed budget expansion for the Fleet and Public Charging Pilots of \$17.3 million in capital and \$5.0 million in O&M. Of the \$22.3 million, \$3.3 million is reserved for each pilot while the additional \$15.7 million can be used for either pilot. (Xcel, CEG, City of La Crescent, ZEF Energy, EVgo, Tesla, ATE)
- 45. Reject the proposed budget expansion for the Fleet EV Service and Public Charging Pilots. (Department)
- 46. Approve a budget expansion for the Fleet and Public Charging Pilots limited to the estimated \$3.0 million capital costs associated with 14 ready-to-execute projects identified in Appendix H10 of Xcel's IDP. (Staff interpretation of Department alternative if funding approved)
- 47. Limit the eligibility for the expanded Fleet and Public Charging Pilots budget to projects which represent new customer types or those with limited representation among previously funded projects. (Department, if budget expansion is approved)
- 48. Require Xcel to file an evaluation and pilot results from the Fleet and Public Charging Pilots at least 6 months prior to filing a permanent replacement proposal for the Fleet and Public Charging Pilots. (Staff proposal)
- 49. Approve the Company's Application Review and Scoring framework. (Xcel, Department, if budget expansion approved)

Information Technology

- 50. Approve Xcel Energy's proposed investments in Information Technology of \$2.4 million in capital and \$0.9 million in O&M expenditures. (Xcel, [Department](#))

51. Modify Xcel's proposed investments in IT development and maintenance to support its TEP to be consistent with the specific TEP proposals approved, including IT investments related to the School Bus Demonstration Project. (Department)

52. Require Xcel to provide information in its EV Annual Reports on the use of any approved IT funding. (Department)

Miscellaneous

Staff recommends selecting 53 through 55 regardless of any decisions made above.

53. Approve Attachment A as the compiled set of EV reporting requirements for Xcel Energy due June 1 annually. Delegate authority to the Executive Secretary to update the reporting requirements list consistent with the decisions made in this and subsequent EV related dockets. (Staff proposal, [Department, OAG](#))

54. Approve Xcel Energy's proposed tariff updates to Section No. 5, Page Nos. 8.1, 8.2, and 8.3 and Section No. 7, Page Nos. 113.1, 114, 115, 115.1, 117, 117.1, 120, and 121, as depicted in Attachment B to the Company's January 10, 2024 Reply Comments. (Xcel, [Department](#))

55. Where not otherwise noted, require Xcel Energy to file an updated tariff and compliance filing consistent with the Commission's decisions in this proceeding within 30 days of the issuance of the order. (Staff proposal, [Department, OAG, Xcel](#))