



ZEF ENERGY

Building a Zero Emissions Future

June 17th 2019

Mr Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East
Suite 350
St. Paul, MN 55101

Re: Docket No. E015/M-19-337 – Minnesota Power’s Petition for Approval of its Electric Vehicle Commercial Rate Pilot

Dear Secretary Wolf,

We wish to file the following comments in response to Minnesota Power’s EV Commercial rate pilot:

- It is 100% essential to provide rate relief for demand charges in order to see the proliferation of DC Fast Charging. Without a method of rate relief (such as the 30% limiter) owner/operators/developers of DCFC projects cannot effectively operate and maintain this essential infrastructure in a way that profits, or even breaks even against costs. A market failure currently exists for the typical General Service rate schedules at many utilities in MN. As an entity deeply embedded in the MN market, we can share with you that DCFC deployment will either be severely hampered, or non-existent in communities/territories where demand charge rates are not addressed.
- We thank Minnesota Power for the consideration of a 3 year pilot period, and we would encourage them to consider a ramp-off period, or surety to owner operators for what happens past this time. Infrastructure is expensive, but may have to be removed or shut down if rate relief is not considered into the medium term.

Regards,

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