



414 Nicollet Mall  
Minneapolis, MN 55401

July 15, 2020

—Via Electronic Filing—

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

RE: PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF  
MODIFICATIONS TO THE RESIDENTIAL EV SUBSCRIPTION SERVICE PILOT  
PROGRAM  
DOCKET NO. E002/M-19-186

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the attached Petition requesting approval of modifications to our EV Subscription Service Pilot in the above-referenced docket.

Pursuant to Minn. Stat. § 216.17, Subd. 3, we have electronically filed this document with the Minnesota Public Utilities Commission, and a copy of the Summary of Filing has been served on the parties on the attached service lists. Please contact Carl Cronin at [carl.cronin@xcelenergy.com](mailto:carl.cronin@xcelenergy.com) or (612) 215-4669 if you have any questions regarding this filing.

Sincerely,

/s/

AMY A. LIBERKOWSKI  
DIRECTOR, REGULATORY PRICING & ANALYSIS  
NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION

Enclosure  
cc: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF MODIFICATIONS TO  
THE RESIDENTIAL EV SUBSCRIPTION  
SERVICE PILOT PROGRAM

DOCKET NO. E002/M-19-186

**PETITION**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Commission this petition requesting approval of modifications to our EV Subscription Service Pilot in the above-referenced docket. Modifications are necessary to address the impact that the COVID-19 pandemic has had on pilot operations.

The EV Subscription Service Pilot was launched early in 2020, designed around a convenient “flat” monthly rate designed to minimize barriers to EV adoption and to encourage offpeak charging. In late March, Governor Walz issued a Stay-At-Home order due to the emerging threat of COVID-19.<sup>1</sup> The pandemic and its response are affecting customer driving behavior, and relatedly, customer charging behavior. With lower than expected charging consumption, participants in our EV Subscription Service Pilot may not be seeing the full benefit of the monthly subscription price for off-peak EV charging, which was based on assumptions related to pre-pandemic driving behavior.

To acknowledge that pilot participants are in an unexpected situation, and to demonstrate our appreciation for their ongoing participation in our pilot, the Company intends to issue a \$50 bill credit to each of the 54 customers who enrolled in the pilot before June 1, 2020. We expect the bill credits to be issued in August of

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<sup>1</sup> State of Minnesota Emergency Executive Order 20-20 (March 25, 2020)

this year. The refund of revenues related to these bill credits will not be included in the EV cost tracker and the Company will not seek cost recovery for the credits in future rates. We do not seek Commission action regarding this bill credit and we discuss it here for informational purposes only.

In addition to changing driving and charging behaviors, the Stay-At-Home order also effectively shut down many local businesses, including auto dealerships. Because one of our primary enrollment channels for the pilot is working with dealerships to make new EV drivers aware of the offering, and because auto sales in general have slowed, our enrollment rate has slowed significantly from the initial rush we saw at pilot launch.

The potential result of these circumstances is that the Company's ability to generate meaningful, actionable learnings from the pilot is challenged. To address these challenges, we request the Commission approve two minor modifications to the pilot intended to improve the ability of our pilot to deliver meaningful results despite the unusual circumstances.

Our requested modifications include 1) extending the term of the three year pilot for an additional year, and 2) increasing the maximum number of pilot participants by 50 customers. We believe that these narrowly-focused changes are reasonable responses to the pandemic-related impacts to the pilot and will afford us the best opportunity to obtain meaningful learnings from the pilot. Neither of these changes require a change to our tariff and we do not believe these changes should be controversial as the fundamental operations of the program remain the same.

## **I. SUMMARY OF FILING**

A one-paragraph summary is attached pursuant to Minn. R. 7829.1300, subp. 1.

## **II. SERVICE ON OTHER PARTIES**

Pursuant to Minn. R. 7829.1300, subp. 2 and Minn. Stat. § 216.17, subd. 3, Xcel Energy has electronically filed this document. A summary of the filing has been served on all parties on our miscellaneous electric service list and on the enclosed service list for Docket No. E002/M-19-186.

## **III. GENERAL FILING INFORMATION**

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

**A. Name, Address, and Telephone Number of Utility**

Northern States Power Company doing business as:

Xcel Energy

414 Nicollet Mall

Minneapolis, MN 55401

(612) 330-5500

**B. Name, Address, and Telephone Number of Utility Attorney**

Mara K. Ascheman

Senior Attorney

Xcel Energy

414 Nicollet Mall, 401 - 8<sup>th</sup> Floor

Minneapolis, MN 55401

612-215-4605

**C. Date of Filing**

The date of this filing is July 15, 2020.

**D. Statute Controlling Schedule for Processing the Filing**

This Petition falls within the definition of a miscellaneous filing under Minn. R. 7829.0100, subp. 11, because no determination of Xcel Energy's general revenue requirement is necessary. Minn. R. 7829.1400, subps. 1 and 4, permits comments in response to a miscellaneous filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

**E. Utility Employee Responsible for Filing**

Amy Liberkowski

Director, Regulatory Pricing & Analysis

Xcel Energy

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Minneapolis, MN 55401

(612) 330-6613

**IV. MISCELLANEOUS INFORMATION**

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

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Senior Attorney  
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Minneapolis, MN 55401  
mara.k.ascherman@xcelenergy.com

Lynnette Sweet  
Regulatory Administrator  
Xcel Energy  
414 Nicollet Mall, 401 - 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Ms. Sweet at the Regulatory Records email address above.

## **V. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE**

No significant revenue effect net of incremental costs is expected during the pilot period, and we do not expect our recommended modifications to result in additional costs. We are accumulating learnings from this pilot that will allow us to assess the amount of utilization and revenues that result from pilot operations. We will provide a discussion of these assessments in future EV annual reports.

## **VI. DESCRIPTION AND PURPOSE OF FILING**

Due to the impact of the unprecedented COVID-19 pandemic on the enrollment and operations of the pilot, we are recommending two narrow changes to the program. The first is an extension of the pilot term for an additional 12 months. The second is expanding the scope of maximum participation in the pilot by an additional 50 participants. We believe these changes are reasonable modifications that will help obtain meaningful learnings from the pilot by ensuring a sufficiently robust pilot size and duration, despite challenges to the subscription-based model caused by the pandemic.

### **A. Extension of Pilot Term**

The pilot was originally slated to run for three years, allowing for a recruitment period with participants normally signing 24-month contracts. The Company is requesting that an additional year be added to the term of pilot operations. We believe this is an important modification that will allow us to gain insights from the operations of this pilot notwithstanding the effects of COVID-19. Pilot participant driving has been affected by the pandemic and may be for some time. We do not believe that the charging profiles of customers we currently see in the data is representative of what charging will be long term. Adding a year to the pilot term will allow time for participants' driving to return to normal behavior after the effects of the pandemic recede. An additional year will also allow us more time to bring more

participants into the pilot and gather more data from customers, which can be used in determining whether this is an offering that can and should be expanded.

For new enrollees, we propose to maintain the 24-month term of participation set out in the customer agreements included with our initial Petition in this docket. For existing participants, we are proposing that they be given the opportunity to extend the term of their customer agreements by an additional year, to align with an expanded pilot term. If the pilot term is extended, we will reach out to existing customers to seek their written consent to modify the term of their participation under the customer service agreement. We do not believe this change to the pilot requires a tariff change because our Residential Electric Vehicle Subscription Pilot Service Tariff (Section No. 5, Original Sheet No. 8.1) says that “[t]he initial contract period will normally be for 24 months.”

## **B. Additional Pilot Participants**

The Company is also requesting Commission approval to add 50 participants to the pilot participation cap. This would bring the participant limit up to 150 customers. Adding participants will allow us to bring a larger number of customers that join the pilot *after* the effects of the COVID-19 pandemic have been felt and have a full set of data that is representative of charging loads after the pandemic has subsided.

As stated above, the Company had 54 customers enrolled in the pilot prior to June 1, 2020. The Company has currently experienced only minimal attrition from the program due to the pandemic. One customer left the program due to driving significantly less under current conditions. There were also an additional four customers who have been accepted into the program but have not yet begun participation due to reassessing the economic benefit of the program.

We do not believe that adding 50 more participants will add significant incremental costs to the program or impact current participants. Nor should adding participants have a material impact on non-participating customers given that the pilot is designed so that the costs are borne only by pilot participants themselves.

## **CONCLUSION**

The Company appreciates the Commission’s consideration of this narrow set of changes to our Residential EV Subscription Service pilot. Specifically, we are requesting Commission approval to extend the term of the three year pilot for an additional year and increase the maximum number of pilot participants by fifty

customers. We are recommending these changes to acknowledge the impact that the COVID-19 pandemic has had on the pilot.

Dated: July 15, 2020

Northern States Power Company

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF MODIFICATIONS TO  
THE RESIDENTIAL EV SUBSCRIPTION  
SERVICE PILOT PROGRAM

DOCKET NO. E002/M-19-186

**PETITION**

**SUMMARY OF FILING**

Northern States Power Company, doing business as Xcel Energy, submits to the Commission this petition requesting approval of modifications to our EV Subscription Service Pilot in the above-referenced docket. Modifications are necessary to address the impact that the COVID-19 pandemic has had on pilot participants, along with the issues it has created in gathering learnings from pilot operations. We are requesting Commission approval to add 12 months to the term of the pilot as well as add 50 participants. We believe these narrow changes will allow us to gather additional information about the pilot and salvage potential learnings that have been hindered by the pandemic.



## **CERTIFICATE OF SERVICE**

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET No. E002/M-19-186**

Dated this 15<sup>th</sup> day of July 2020

/s/

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Lynnette Sweet  
Regulatory Administrator

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