

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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August 17, 2020

**In the Matter of Xcel Energy's Petition
for Approval of a Residential EV
Subscription Service Pilot Program**

Docket No. E002/M-19-186

**Initial Comments of Fresh Energy, Minnesota Center for Environmental Advocacy,
Sierra Club, and Union of Concerned Scientists**

Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, and Union of Concerned Scientists (collectively the Clean Energy Groups) submit these Initial Comments in response to the Commission's July 22, 2020 [Notice of Comment Period](#).

The Clean Energy Groups find Xcel Energy's request to extend the term of the three-year pilot for an additional year and increase the cap on pilot participants by 50 customers to be a sensible response to the circumstances of the COVID-19 pandemic. These modifications will enable Xcel to generate important findings and lessons learned in this dynamic situation in the spirit of the Commission's philosophy on pilot programs to "allow utilities to experiment with different approaches to rate design [...] and other EV issues."¹ Specifically, the pilot aims to test a subscription pricing model to encouraging off-peak charging while enabling EV adoption.

The COVID-19 pandemic has altered people's daily lives and left us in a persistent state of uncertainty. Early on, stay-at-home orders, including one from Governor Walz, drastically reduced personal vehicle use for many Minnesotans. Even as states and communities return to some daily business following the expiration of stay-at-home orders, driving behaviors remain modified for many customers. The fact of the matter is that quotidian routines may remain altered for some time to come as Minnesota progresses through and emerges from the public health and economic crises.

¹ Order Making Findings and Requiring Filings at 9 (February 1, 2019), Docket No. E-999/CI-17-879.

It is important now, more than ever, to collect meaningful data and lessons learned because much of the historical data we have on consumers' driving and charging behavior does not apply to the current circumstances and may not apply to whatever new "normal" we reach in the future. Extending the Xcel EV Subscription Pilot would augment the pilot's ability to serve that purpose through both of the changes requested. First, a longer program duration will enable Xcel to observe participant data over an extended period as the dynamic public health and economic circumstances evolve, perhaps even back to something "normal" as Xcel suggests.² Second, a larger participant pool will give Xcel and the Commission better visibility into how the circumstances are affecting different participants' behavior in different ways.

The Clean Energy Groups also support Xcel's approach of giving existing participants an option, rather than a requirement, to extend their participation through the third year of the pilot. This is an important choice to maintain for existing customers, who signed up expecting a two-year contract and for whom adding a third year may not be a preferred or feasible path forward.

In considering the requested modification, it is also important to note that pilot infrastructure costs are borne by pilot participants themselves.³ This design will mitigate the effect of the program modifications on non-participants.

In conclusion, the Clean Energy Groups recommend the Commission approve the Residential EV Subscription Service Pilot Program modifications, as proposed.

² Xcel Energy Petition for program modifications at 4.

³ Xcel Energy Petition for program modifications at 5.

/s/ Sam Houston

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CERTIFICATE OF SERVICE

I, Samantha Houston, hereby certify that I have this day, served a copy of the following document to the attached list of persons by electronic filing.

**Initial Comments of Fresh Energy, Minnesota Center for Environmental Advocacy,
Sierra Club, and Union of Concerned Scientists**

Docket No. E002/M-19-186

Dated this 17th day of August 2020

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