



July 17, 2019

Docket No. E002/M-19-186

Mr. Will Seuffert, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: Initial Comments of Greenlots in Support of Xcel Energy's Proposed Modifications to its Residential EV Subscription Service Pilot Program

Dear Mr. Seuffert,

Greenlots submits these comments to the Minnesota Public Utilities Commission ("the Commission") in response to its July 22, 2020 Notice of Comment Period inviting comments regarding Xcel Energy's ("Xcel" or "the Company") Petition For Approval of Modifications to the Residential EV Subscription Service Pilot Program, filed on July 15, 2020.

Greenlots is a leading provider of electric vehicle ("EV") charging software and services and a wholly-owned subsidiary of Shell New Energies, committed to accelerating transportation electrification in Minnesota. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America. Greenlots' smart charging solutions are built around an open standards-based focus on future-proofing while helping site hosts, utilities, and grid operators manage dynamic electric vehicle charging loads and respond to local and system conditions.

Greenlots supported Xcel's original subscription service pilot program, filing initial and reply comments in support, and is encouraged by Xcel's continued efforts to propose, expand, and in this case, adapt its portfolio of EV pilot programs. As Greenlots has emphasized in other proceedings before the Commission, utilities have a critical and central role to play in accelerating the market for advanced, electrified mobility, overcoming barriers to EV adoption, and doing so in an equitable manner. Nimble utility involvement is also critical to ensure programs are effective, and continue to meet customer needs and broader goals when there are unforeseen circumstances.

In response to the current global pandemic that is dramatically affecting customer driving behavior, and as a result, the amount of electricity consumed for charging in this pilot, Xcel notes that it will be issuing a \$50 bill credit to each of the 54 customers that enrolled in the pilot prior to June 1, 2020, which the Company will not seek cost recovery for. Separately, Xcel requests approval for two modest modifications to the pilot given these circumstances. First, it proposes to extend the term of the three-year pilot for one additional year. Second, it requests to increase the maximum number of pilot participants by 50 customers, for a new of cap 150 customers.

Greenlots agrees with the Company that these changes are appropriate and will help support pilot learnings that are aligned with its original intent. This will also help address depressed enrollment figures, in particular as a result of decreased activity through dealership enrollment channels, and decreased interest as a result of less driving, by providing more time, and adding additional participants to offset non-representative data gathered during the pandemic.

For these reasons and with the comments offered, Greenlots supports and requests that the Commission approve Xcel's petition. We look forward to continued engagement in efforts supporting transportation electrification in Minnesota, and we thank the Commission for consideration of these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Thomas Ashley', with a stylized, cursive script.

Thomas Ashley
VP, Policy & Market Development