



414 Nicollet Mall
Minneapolis, MN 55401

August 27, 2020

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

—Via Electronic Filing—

RE: REPLY COMMENTS
RESIDENTIAL ELECTRIC VEHICLE SUBSCRIPTION SERVICE PILOT
DOCKET NO. E002/M-19-186

Dear Mr. Seuffert,

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the August 17, 2020 Comments from the Minnesota Department of Commerce (Department), Clean Energy Groups (CEGs)¹, ChargePoint, Greenlots, and The Xcel Large Industrials (XLI) in the above-referenced docket.

We appreciate the review of our request provided by the parties. The Department, CEGs, ChargePoint, and Greenlots all expressed support for our proposed modifications. Each party recognized that COVID-19 has had a significant impact on the Minnesota economy, which in turn has had an impact on our pilot operations. In general, the parties noted that our proposed modifications can help support the goals of the pilot, which is gathering key learnings on operating an EV subscription service.

In our June 1, 2020 EV Annual Report, we noted that through April 2020, the average customer had used about 235 kWh per month for charging. This was over 100 kWh per month lower than we initially estimated.² Data from subsequent months has shown the average monthly customer usage has begun to increase month over month. Table 1 shows the monthly kWh usage for May through July 2020.

¹ Consists of Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, and Union of Concerned Scientists.

² See Table 8 in our June 1, 2020 Compliance Filing filed in Docket Nos. E002/M-15-111, E002/M-17-817, and E002/M-19-186

Table 1³
Total Energy Usage Per Month
Monthly kWh Usage

Date	Customers	On-Peak	Off-Peak	Total
Mar-20	14	68	3,108	3,176
Apr-20	32	117	7,865	7,982
May-20	39	159	8,180	8,339
Jun-20	47	346	12,520	12,866
Jul-20	40	491	11,834	12,325

While the average usage shown in this data is below our expected monthly average of 340 kWh per month, more recent data shows that charging activity may be trending back up, potentially as people adjust to the effects of the pandemic or begin to drive more as stay-at-home restrictions are lifted. Even if energy usage is trending back towards our expected monthly usage, we believe that the modifications sought by the Company and supported by stakeholders are necessary. At present, approximately six months of energy usage data show impacts from pandemic-related changes in behavior. Further, the pace of enrollment and participant attrition are both factors that have been impacted. These observations support the need for modifying the pilot to lengthen its duration and increase its participant quantity.

The Department noted that, even with no quantitative way to measure COVID-related impacts, it is reasonable to conclude that an impact from the pandemic has occurred, and that the Company's proposed solution would provide more meaningful data about the pilot. We agree with this assessment and look forward to gaining learnings about this new model.

We appreciate the opportunity to provide the Commission with our Reply Comments. We have electronically filed this document with the Commission and notice of the filing has been served on the parties on the attached service list. Please contact Carl Cronin at carl.cronin@xcelenergy.com if you have any questions regarding this filing.

SINCERELY,

/s/

AMY A. LIBERKOWSKI
DIRECTOR, REGULATORY PRICING & ANALYSIS

c: Service List

³ The March and April data was shown in Table 8 of our June 1, 2020 Compliance Filing and the May through July data in this table was shown in our response to the Department's Information Request No. 2

CERTIFICATE OF SERVICE

I, Paget Pengelly, 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 27th day of August 2020

/s/

Paget Pengelly
Regulatory Administrator

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