



September 30, 2020

Docket No. E999/CI-17-879

Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

RE: Comments of Greenlots Regarding Utilities' Second Transportation Electrification Plan Filings

Dear Commissioners and Staff,

Greenlots submits these initial comments to the Minnesota Public Utilities Commission ("the Commission") in response to the Commission's July 20, 2020 Notice of Comment Period ("the Notice") regarding the Transportation Electrification Plans ("TEPs") filed by Xcel Energy, Otter Tail Power Company, and Minnesota Power (collectively "the Utilities" or "the Companies"). Per the Commission's August 21, 2020 "Notice of Extended Comment Period", this is timely filed.

Greenlots is a leading provider of electric vehicle ("EV") charging software and services committed to accelerating transportation electrification in Minnesota, and a wholly owned subsidiary of Shell New Energies. The Greenlots network supports a significant percentage of the DC fast charging infrastructure in North America, and an increasing amount of Level 2 infrastructure. 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 EV charging loads and respond to local and system conditions.

Greenlots has reviewed the Utilities' second TEP filings, in addition to Xcel Energy's responses to the Commission's July 20 information requests issued to Xcel. Below we provide brief responses to the Commission's questions and topics open for comment as stated in the July 20 Notice. Note that here we are not commenting on the specifics of the utilities' existing and proposed programs, or advocating for specific programmatic outcomes, instead limiting comment to the broader TEPs, their conformance with the Commission's direction, and the questions posed by the Commission in the Notice.

1. Should the Commission accept Minnesota Power, Otter Tail Power, and Xcel Energy's second transportation electrification plans?

Yes, it should. The TE Plans filed by the Companies appear to each meet the requirements set forth in the Commission's February 1, 2019 Order and as amended in the Commission's December 12, 2019 Order accepting the first TEPs. Additionally, each appears to be appropriately mindful of each utility's unique service areas, while providing a reasonable level of

detail considering that these plans discuss both past activity and future planned filings and programs. Each provides an adequate picture of the Companies' thinking, strategy and approach to supporting transportation electrification in their service areas and planned future filings and programs. While there is certainly significant opportunity to grow the vision of the Utilities around transportation electrification, these plans represent an appropriate articulation of current and near-term activities and vision related to transportation electrification.

- 2. Are there any additional components utilities should include in subsequent TEPs, or modifications to existing requirements?**
- 3. Are utility EV forecasts in line with state and national market growth projections? Do utilities EV forecast scenarios adequately address a range of futures including the possibility of state or national clean car standards and corporate procurement goals?**
- 4. Are there sectors of EV Charging and Infrastructure the Commission should revisit or examine more closely after experience with existing pilots and tariffs?**

Answering these questions together, and from review of the utilities' TEPs, Greenlots believes there could be value in subsequent Commission TEP guidance and utility TEP reporting in a few areas:

- Greenlots sees opportunity to expand required TEP guidance to specifically prompt utilities to detail and report on their planning and programs to support medium and heavy-duty electrification. These represent areas that can achieve an even greater magnitude of environmental and climate benefits, in addition to often more directly addressing equity and environmental justice considerations. There is a wave of such vehicles coming to market, and this will put heightened pressure on the infrastructure programs needed to support their proliferation and adoption. For comparison, in California, of the nearly \$1.5 billion in utility transportation electrification program expenditures that have been approved, nearly half has been for medium and heavy-duty-focused programs. As part of this, it could be valuable for TEPs to explicitly detail the medium and heavy-duty transportation market and electrification opportunities in their respective service areas, relevant market developments and announcements, the opportunity and need for utility programs to support or accelerate these efforts, and the internal planning and programs in development to address these needs.
- With respect to EV forecasts, it appears there could be value in more explicitly prompting utilities to detail their assumptions and the market and policy developments, whether they have occurred, are in development, or are on the horizon, in informing or these assumptions and the EV forecast outputs. For example, whether and to what degree forecasts account for the potential MPCA adoption of a Clean Cars Rule, or announcements made in other jurisdictions that could have spillover effects, such as California Governor Newsom's Executive Order committing all new passenger vehicle

sales to be zero emission by 2035, and have all medium and heavy-duty vehicle operations be zero emission by 2045 where feasible (2035 for drayage trucks).

- It appears there's an opportunity to update Commission TEP guidance to specifically require a discussion on current and planned activities to support EV equity and equitable access to transportation electrification, both from an urban-rural standpoint, and socioeconomic standpoint.
- Greenlots would encourage Commission TEP guidance to prompt a discussion of utility plans and activities to expand or scale existing programs, as applicable. Greenlots is a strong supporter of scaling the market for electric vehicles and electric vehicle charging products and services as quickly as possible, and frequently comments that it's time to move beyond pilots to scaled programs and ensure that pilots have appropriate bridge mechanisms built in to be able to scale. This is critical to avoid slowdowns or gaps in funding or programs, in addition to meeting the state's goals and market need. Accordingly, Greenlots encourages appropriate focus on this important planning and reporting consideration.

5. Do current and proposed EV programs achieve a reasonable rate as outlined in Minn. Stat. 216B.03? Please address:

- 1. Whether current EV programs achieve equitable outcomes for customers?**
- 2. If there are gaps the Commission should address to ensure equitable application for customers?**

Greenlots has no additional comment in response to these questions at this time, beyond the above note regarding opportunity for enhanced TEP filing requirements with respect to transportation electrification equity.

6. Are there other issues or concerns related to this matter?

Greenlots has no additional comment at this time.

Conclusion

For these reasons and with these comments offered, Greenlots supports and respectfully requests that the Commission approve each of the Companies respective Transportation Electrification Plans. 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