

October 9, 2020

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

—Via Electronic Filing—

RE: REPLY COMMENTS  
IN THE MATTER OF A COMMISSION INQUIRY INTO ELECTRIC VEHICLE  
CHARGING AND INFRASTRUCTURE  
DOCKET NO. E999/CI-17-879

Dear Mr. Seuffert,

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the September 30, 2020 Comments from the Minnesota Department of Commerce (Department), Clean Energy Groups (CEGs),<sup>1</sup> and Greenlots. We thank the parties for their review of our 2020 Transportation Electrification Plan (TEP) report and for their recommendations to the Commission to approve the TEP. We appreciate the enthusiasm for our EV programs and parties' continued engagement in the development and review of our EV proposals.

The Department has three recommendations for additional reporting in 2021 TEP reports, including providing a five-year budget for future expenditures (with historical expenditures), estimating system upgrades and expenditures, and evaluation of EV programs that have passed the pilot phases. We believe the Department's recommended reporting also covers the potential reporting mentioned by Greenlots in their comments. While we understand why the Department and Greenlots desire this information, we note it would expand the scope of the TEP significantly. That said, if the Commission believes the expansion in scope is warranted, we do not object to the Department's recommendations to provide five-year forecasts to the extent available, historical expenditures, estimated system upgrade costs to facilitate EV charging to the extent available, and an evaluation of our ongoing permanent EV offerings in our 2021

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

TEP report. If the Commission chooses to include this as a part of future reporting requirements, we ask that it consider whether TEP reporting is more practical every other year (biennially) rather than annually.

The CEGs post two recommendations related to school buses. First, that the Commission require the Company to file a proposal for an electric school bus pilot that demonstrates vehicle-to-grid (V2G) capabilities by or before the 2021 TEP filing date. As the Company has previously discussed, we have been assessing the viability of a school bus V2G pilot, including assessing the technological viability of available equipment that could facilitate the program and gauging school district interest. There has been good progress made in understanding some key components of the technology and market readiness of a demonstration project, however, the Company's exploratory work is ongoing at this time. While we do anticipate being in a position to file a proposal prior to the next TEP, if the Company has not filed a V2G proposal by that time, we could provide a detailed update on our progress toward a V2G proposal in the TEP. In addition, the Company has filed a proposal to provide rebates to school districts to purchase electric school buses, and needed charging infrastructure installations.<sup>2</sup> As proposed, the rebates are available to school districts to purchase buses that have V2G capabilities.

Second, the CEGs also urged the Company to partner with potential applicants for the Minnesota Pollution Control Agency (MPCA)'s electric school bus funding pilot program. We share the enthusiasm for bringing forward opportunities to introduce more electric school buses in our service territory. To that end, as mentioned the Company proposed an ambitious electric school bus rebate program that will provide funding to school districts to purchase buses and charging infrastructure.<sup>3</sup> We view this as a parallel, complementary effort to the MPCA grant process that will provide support to local school districts. Beyond our proposed rebate program, we have also had discussions with local school districts to provide supply and charging infrastructure support through our EV Fleet Pilot Service.

Finally, the CEGs asked if the Company could consider tracking increases in electricity use and proactively reach out to those customers to check if they have purchased an EV and if so, educate them about our managed charging options. The Company has a robust portfolio of engagement activities that allows us to reach potential customers throughout the EV journey. This includes before they purchase through our online

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<sup>2</sup> Proposal discussed in our September 15, 2020 Response and Petition in Commission's COVID-19 Relief and Recovery Docket (E,G999/CI-20-492)

<sup>3</sup> Ibid.

EV Advisor Tool, at the time of purchase through our dealer partnerships, and after purchase through marketing of our ever-expanding managed charging offerings.

We are continuing to assess ways to build on our existing engagement strategies to encourage greater EV program participation. We anticipate that the recommendation from the CEGs has potential as an outreach strategy, along with other segmentation and targeting tools that could be available in the future with advanced metering infrastructure. If the Commission is interested, we can provide an assessment of incorporating CEGs' recommendation, and other potential engagement opportunities, as a part of our annual TEP discussions.

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](mailto:carl.cronin@xcelenergy.com) if you have any questions regarding this filing.

SINCERELY,

/s/

HOLLY HINMAN  
REGULATORY MANAGER

c: Service List

## CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

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

or

xx electronic filing

**Docket No. E999/CI-17-879**

Dated this 9<sup>th</sup> day of October 2020

/s/

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Lynnette Sweet  
Regulatory Administrator

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