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October 12, 2020

VIA ELECTRONIC FILING

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

Re: In the Matter of Minnesota Power's 2020 Transportation Electrification Plan
Docket No. E999/CI-17-879

Dear Mr. Seuffert:

Enclosed please find Minnesota Power's Reply Comments in the above referenced Transportation Electrification Plan. Feel free to contact me with any questions related to this matter.

Respectfully,

Jess A. McCullough
Policy Advisor – Regulatory Strategy & Policy
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**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of a Commission Inquiry into
Electric Vehicle Charging & Infrastructure

Docket No. E999/CI-17-879
MINNESOTA POWER
REPLY COMMENTS

I. INTRODUCTION

Minnesota Power (or, the “Company”) respectfully submits the following Reply Comments regarding the Company’s 2020 Transportation Electrification Plan (“TEP”) in response to Initial Comments from the Minnesota Department of Commerce, Division of Energy Resources (“Department”), Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, Union of Concerned Scientists, filing jointly as Clean Energy Groups (“CEGs”), and Greenlots (“Greenlots”). On July 6, 2020, Minnesota Power submitted TEP in Docket No. E-999/CI-17-879. On September 30, Initial Comments were filed by the Department, OAG, and Clean Energy Groups. A summary of those initial comments and the Company’s responses are below.

II. RESPONSE TO STAKEHOLDER COMMENTS

In the comments filed on September 30, all parties recommended that the Commission approve Minnesota Power’s TEP and offered suggestions for information to be included in future TEP filings. The Company appreciates these suggestions and views them as positive momentum toward electrifying transportation in Minnesota. However, regarding the suggestions of additional information being required in future TEPs, it is the Company’s preference to streamline relevant EV reporting, where possible, to reduce the burden placed on utilities to prepare multiple compliance filings for overlapping projects, such as the annual TEP¹, the annual EV tariff compliance filing², and each individual program compliance filing. In most instances, the utilities will have compliance reporting requirements for each individual EV program or pilot to evaluate program status and effectiveness, and it is the Company’s concern that an increased number of compliance filings would detract time and resources that would be otherwise spent on project development. Minnesota Power understands the need to provide information on its electrification programs and plans, but recommends the Commission ensure that any additional information required for future TEPs is immediately relevant, and eschew requiring specific program proposals and budgets too far into the future. Considering the rapid pace of technological advancements and customer programming in the industry in

¹ Docket No. E-999/CI-17-879.

² Docket No. E015/M-15-120.

general, specific long term EV project budgets and proposals are likely to significantly change before implementation.

Regarding issues raised in these comments specifically about Minnesota Power's TEP, the Company offers the following responses:

A. Department of Commerce

While the Department recommends that the Commission accept the TEPs presented by Minnesota Power, Xcel Energy, and Otter Tail Power, the Company wishes to respond to the following points raised regarding Minnesota Power-specific issues.

Meter Data Management System & Advanced Metering Infrastructure

On page 10 of its Initial Comments, the Department cited Minnesota Power's Integrated Distribution Plan ("IDP") filed November 1, 2019 in which the Company stated that its Meter Data Management System would be installed in 2019-2020. The MDM will go live in early 2021. The Company further stated that its Advanced Metering Infrastructure ("AMI") structure would be fully deployed by 2023. The Company wishes to reaffirm that both MDM implementation and AMI deployment remain on track to meet these targets.

Private Sector Fast Charging Infrastructure

On page 12 of its Initial Comments the Department noted that "MP discussed availability and awareness of public charging infrastructure but did not directly assess private sector fast charging marketplace." Assessment of the private sector fast charging EV marketplace in the Company's service area is an ongoing process. The Company expects to have further information on this and other aspects of EV marketplace development in future filings.

B. Clean Energy Groups

The CEGs also recommended the Commission accept the TEPs submitted by the Company, Xcel Energy and Otter Tail Power. The Company appreciates the CEGs commendation of its EV Charging Rewards and Rebate Pilots, as well as CEGs support of the Company's engagement with the Minnesota Pollution Control Agency ("MPCA")'s bus electrification pilot. The Company has implemented a commercial EV rate to support the seven electric buses currently operated by the Duluth Transit Authority ("DTA"). The CEGs expressed the desire that the Company pursue "additional partnership with Duluth Transit Authority, for instance to support conversion of the demonstration project into a permanent implementation" and to engage with further transit providers in its service territory. The Company is grateful for the support of CEGs in its efforts in this area.

C. Greenlots

Greenlots also recommended Commission acceptance of the TEPs from Minnesota Power, Xcel Energy, and Otter Tail Power. While Greenlots did not raise any specific concerns relating to the Company's TEP, the Company appreciates their support of broader statewide transportation electrification efforts.

III. CONCLUSION

Minnesota Power appreciates the continued collaboration with interested stakeholders and the opportunity to respond to initial comments. The Company wishes to restate its commitment to the State's transportation electrification goals while providing reliable, affordable services to its customers, and requests that the Commission take into account the Company's recommendation to streamline EV compliance reporting when revising future TEP requirements.

If you have any questions regarding this filing, please contact me at 218.428.9846 or jmccullough@mnpower.com.

Dated: October 12, 2020

Respectfully,



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STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 12th day of October, 2020, she served Minnesota Power's Reply Comments in **Docket No. E999/CI-17-879** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



Tiana Heger