

STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION

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October 20, 2020

In the Matter of an Inquiry into Electric
Vehicle Charging and Infrastructure

Docket No. E999/CI-17-879

**Reply Comments of Fresh Energy, Minnesota Center for Environmental Advocacy,
Natural Resources Defense Council, Sierra Club,
Union of Concerned Scientists, and Plug In America**

Fresh Energy, Minnesota Center for Environmental Advocacy, Natural Resources Defense Council, Sierra Club, Union of Concerned Scientists, and Plug In America (the Clean Energy Groups, or CEGs) appreciate the opportunity to submit these Reply Comments in response to initial comments filed in Docket E999-17-879. In this response, we address comments submitted by Xcel Energy.

CEGs continue to recommend that the Commission approve the Transportation Electrification Plans (TEPs) filed by Otter Tail Power and Minnesota Power as filed. We also recommend that the Commission approve the TEP filed by Xcel Energy with one modification: require Xcel Energy to file a proposal for an electric school bus pilot that demonstrates vehicle-to-grid capabilities on or before the 2021 TEP filing date.

As discussed in our initial comments, widespread vehicle electrification provides substantial benefits in the form of reduced greenhouse gas emissions and other air pollution, as well as cost savings to both operators and ratepayers. Electric school buses in particular have the potential to reduce tailpipe emissions and improve air quality for children, while also providing energy storage during times when buses are not in use. CEGs are pleased that Xcel Energy is making progress in assessing the viability of a school bus vehicle-to-grid proposal.

In its reply comments in this docket, Xcel Energy stated that it anticipates being ready to file a V2G proposal by the next TEP filing date. However, if the utility is unable to file such a proposal at that time, it would be willing to provide a detailed update on its progress toward a V2G proposal.¹ CEGs appreciate the Company's work on this issue, as well as the commitment to providing an update in its next TEP. However, recognizing the urgent need for heavy-duty vehicle electrification and the significant benefits that a V2G school bus program would provide, we urge

¹ Xcel Energy Reply Comments at 2

both Xcel and the Commission to prioritize this proposal. In its Order in this docket, the Commission should include a requirement for Xcel Energy to file an electric school bus pilot program proposal that demonstrates vehicle-to-grid capabilities on or before the 2021 Transportation Electrification Plan filing date.

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CERTIFICATE OF SERVICE

I, Aaron Decker, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing.

- **Clean Energy Groups' Reply Comments**

Docket No. E999/CI-17-879

Dated this 20th day of **October, 2020**

/s/Aaron Decker

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