

October 20, 2020

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, Minnesota 55101-2147

RE: **Reply Comments of the Minnesota Commerce Department, Division of Energy Resources**  
Docket No. E999/CI-17-879

Dear Mr. Seuffert:

Below are the Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

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

On September 30, 2020 the Department recommended that the Minnesota Public Utilities Commission (Commission) accept Minnesota Power, Otter Tail Power, and Xcel Energy's second Transportation Electrification Plans (TEPs), and require the following additional information to be included in future TEPs:

- the 5-year budget for future expenditures, as well as historical expenditures, for each non-pilot EV program, by budget category. In addition, the budget categories by program should be aggregated so that the Commission and stakeholders can see the total amounts that are being proposed or expended for each budget category (e.g., marketing, EV charging infrastructure, etc.).
- an estimate for each system upgrade needed to accommodate EV charging, and an estimate of the expenditures on other investments that improve a utility's ability to serve EV load.
- non-pilot EV program evaluations that examine the cost-effectiveness of the programs as currently designed and potential changes that could improve their cost-effectiveness.

Between September 30, 2020 and October 12, 2020, the Commission received additional comments in this matter from Greenlots; Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, and Union of Concerned Scientists (collectively referred to as Clean Energy Groups), Minnesota Power, Northern States Power d/b/a Xcel Energy (Xcel), and Otter Tail Power (Otter Tail).

The Department appreciates Xcel's and Otter Tail's willingness to provide the additional information we requested in future TEPs. We note that both Xcel and Otter Tail recommended that if the TEPs include more information such as that recommended by the Department, that the TEPs be limited to once every two years instead of annually. The Department does not object to the biannual schedule if the information does not change significantly between TEP filings.

Greenlots recommended that utilities detail and report on their planning and programs to support medium and heavy-duty electrification. The Department concludes that utilities will automatically include this information in future TEPs but does not object to the Commission specifically requesting this information.

Finally, the Department notes that the Clean Energy Groups asked the Commission to consider how the Commission might center equity in its own decision making and operations. The Department supports consideration of environmental justice and social and economic equity considerations in the TEPs.

Based on review, the Department recommends that for future TEPs, the Commission, in addition to our previous recommendations included above, also consider:

- Increasing the time between TEPs from every year to every two years, and
- Requiring the three electric utilities to specifically include information regarding medium- and heavy-duty EVs.

The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ CHRISTOPHER T. DAVIS  
Analyst Coordinator

CTD/ja  
Attachment

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce**  
**Reply Comments**

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

Dated this **20<sup>th</sup>** day of **October 2020**

**/s/Sharon Ferguson**

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