



September 2, 2022

Mr. Will Seuffert
Executive Secretary, Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 5510

RE: Charge Ahead Partnership Comments on Docket M-22-432

Dear Mr. Seuffert:

Charge Ahead Partnership (“CAP”) respectfully submits the following comments to the Minnesota Public Utilities Commission (“the Commission”) in reference to Docket M-22-432 in the matter of the petition of Northern States Power Company (“Xcel Energy”) for approval of an electric vehicle (“EV”) portfolio proposal and cost recovery method. Charge Ahead Partnership firmly believes that Docket M-22-432 (“EV Portfolio Proposal” or “the proposal”) should be considered separately from Docket GR-21-630 (“MYRP”), and it should be evaluated as a Contested Case Proceeding.

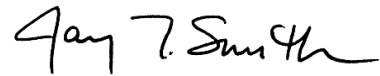
CAP’s members include businesses, organizations, and individuals that share the common goal of ensuring Minnesota’s charging network is positioned to meet electric vehicle drivers’ expectations of quality service, safety, and the affordable, competitive pricing that they have grown accustomed to with the established refueling network. CAP’s Minnesota members will be affected by Xcel Energy’s EV Portfolio Proposal both as ratepayers and as potential providers of EV charging services. We believe it is prudent to evaluate the proposal through a separate proceeding that can take an in-depth look at the substantial cost to Xcel ratepayers and the impacts of the proposal on the future of EV charging in the state. The proposal raises important regulatory and public policy questions about the development of Minnesota’s EV charging network.

As the Commission evaluates the proposal it should consider whether or not it is appropriate for a vertically integrated electric utility, such as Xcel Energy, to expand its monopoly to EV charging services when private businesses are eager to invest. Indeed, the impact on the competitive market for EV charging should be a key consideration as well as the financial impact on ratepayers. Additionally, Minnesota’s EV charging network is slated to receive over \$68 million in federal assistance over five years through the National Electric Vehicle Infrastructure (NEVI) program. The proceedings should evaluate whether or not it is reasonable for Xcel Energy to petition to recover approximately \$200 million to fund the proposal when plans to distribute federal funding are currently being finalized. Furthermore, the purpose of the NEVI funding is to catalyze additional private investment in the EV charging network,¹ which could be substantially delayed if Xcel Energy is allowed to corner the market by passing the costs of EV fast chargers onto ratepayers without market or competitive forces at play.

¹ NEVI Program Guidance, Federal Highway Administration, February 10, 2022.
https://www.fhwa.dot.gov/environment/alternative_fuel_corridors/nominations/90d_nevi_formula_program_guidance.pdf

For the reasons previously stated, CAP urges the Commission to evaluate the EV Portfolio Proposal in a separate, contested proceeding. The ripple effects of this proposal, both on ratepayers and the future of Minnesota's EV charging network, warrant a thorough analysis and high level of scrutiny that can only be achieved by evaluating the proposal separately. Thank you for your consideration of CAP's comments. As the commission studies this issue, CAP is prepared to be a resource and welcomes all future opportunities to participate in this process. We look forward to working with the Commission on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Jay T. Smith". The signature is written in a cursive style with a large initial "J" and a distinct "T" and "S".

Jay Smith
Executive Director
Charge Ahead Partnership
www.ChargeAheadPartnership.com