



April 24, 2026

Via Electronic Filing

Dr. Sydney Lieb
Assistant Commissioner of Regulatory Analysis
Minnesota Department of Commerce
Division of Energy Resources
85 7th Place East, Suite 500
St. Paul, Minnesota 55101-2198

Re: In the Matter of Xcel Energy's 2024-2026 ECO Modification Request Filed January 16, 2026, Docket No. E,G002/CIP-23-92

Dear Assistant Commissioner Lieb,

The Alliance for Transportation Electrification ("ATE") submits these comments in response to the Proposed CIP Decision of the Staff of the Minnesota Department of Commerce, Division of Energy Resources ("Staff") filed April 7, 2026, in the matter of Xcel Energy's ("Xcel's") 2024-2026 Energy Conservation & Optimization ("ECO") Modification Request filed January 16, 2026, in the above-referenced docket.

Introduction

ATE is a 501(c)(6) non-profit corporation established in early 2018 with the goal of promoting policies and regulatory measures to accelerate the pace of EV adoption and infrastructure. We take a "big tent" approach to advance the industry and focus not just on accelerating EV charging deployments—which necessarily requires a strong utility role—but also promoting public accessibility and open standards. We are presently involved in about 30 proceedings in the States before the PSCs, state energy offices, Legislatures, Governors, state DOTs and DEPs, and other agencies. We follow transportation electrification (TE) plans and programs in a variety of states, including Washington, Oregon,

Virginia, Michigan, Colorado, and Minnesota, and in January of this year we filed comments supporting Xcel's most recent TE Plan.¹

Xcel Proposes Tested, Mature Program Designs

In its TE Plan filed in Docket No. E002/M-25-142, Xcel discussed in detail the two programs—Residential Advisory Services and Commercial EV Infrastructure Rebate and Advisory Program—that it subsequently proposed as modifications to its 2024-2026 ECO Plan in the instant docket. Since we are tracking multiple EV programs across many jurisdictions, ATE can attest that both program designs—residential and commercial—are mature and well-tested, and reflect best practices and lessons learned from other utilities. Specifically, the Residential Advisory Services program that Xcel proposes is well-positioned to support residential customers as they consider the switch to an EV. Likewise, the Commercial EV Infrastructure Rebate and Advisory Program, which includes both rebates and Xcel's Fleet Electrification Advisory Program, reflects best practices in program design and offers a streamlined, targeted way for fleets and commercial customers to engage with the utility. We believe that these programs will assist in achieving progress toward Minnesota's target of 20 percent of light-duty vehicles being electric by 2030. We are pleased to see that Staff agrees with this assessment.

EV Charging Infrastructure Programs are Fuel-Switching Programs

Despite Staff's conclusion that the two proposed programs would provide helpful technical and financial resources to help customers overcome barriers to adopting EVs, ATE is concerned to see that Staff recommends that Xcel propose these programs elsewhere within Xcel's ECO portfolio, outside of the Efficient Fuel-Switching category.

ATE emphasizes that *EV charging infrastructure programs are fuel-switching programs*. The objective of Xcel's two proposed programs is not to more efficiently use electricity within the charger or vehicle or to manage load (though Xcel does offer managed charging programs, authorized through the TE Plan); it is to support customers in switching from gasoline or diesel to an electric vehicle. EV charging infrastructure programs lead to load growth, not load reductions.

EV charging infrastructure programs are unique because they do not directly incentivize adoption of the fuel-consuming device (the EV), instead incentivizing installation of the

¹ Alliance for Transportation Electrification, [Re: In the Matter of Xcel Energy's 2025 Integrated Distribution Plan](#), filed January 13, 2026 in Docket No. E002/M-25-142.

fueling infrastructure (the EV service equipment, or EVSE). But this is a common approach in the utility industry, and for good reasons. Such reasons include:

- **Charging infrastructure is essential to EV adoption.**
Lack of charging infrastructure is the top reason that drivers cite for not adopting an EV. A recent study from JD Power showed that 52% of respondents cited “lack of charging station availability” as a reason for EV rejection—the single highest-cited reason.² Other concerns cited in the study—“limited driving distance per charge,” “time required to charge,” and “inability to charge at home or work,” would also be resolved by greater access to charging.
- **Utilities are already involved in the installation of EV charging infrastructure.**
Regardless of whether a customer is installing a 7 kW home charger or a 10 MW public fast-charging site, the utility is an important participant in enabling the charger to be connected to the grid. Customers and developers already include the utility in their plans and communications, making the charger installation process a natural point for the utility to intervene to support EV adoption.
- **Utilities can meaningfully impact the market for charging infrastructure.**
Unlike EV rebates, which were proposed by the Clean Energy Groups in their comments in this docket³, with EV charging infrastructure rebates, utilities can offset a meaningful portion of the customer’s upfront capital costs. Moreover, each publicly available EVSE can support the adoption of multiple EVs, leveraging utility funding to provide fuel to even more vehicles.
- **Charging infrastructure is stationary, ensuring benefits flow to all customers.**
When utilities incentivize the installation of charging infrastructure, they capture revenue from the energy dispensed at that charger at a specific address and location served by the utility—much like they do with other stationary fuel-switching measures. These expanded energy sales help put downward pressure on utility rates for all customers.
- **Utilities can capture ancillary value from EV charging infrastructure programs.**
The benefits of an EV charging infrastructure program to the utility include better understanding of customer barriers; early data about impending projects; and charging session data to inform distribution system planning. Utilities across the country are using data and lessons learned from their EV charging infrastructure

² JD Power, [Despite Improvements in Reliability and Availability, Public Charging Remains Top Stumbling Block to EV Adoption](#). June 2025.

³ Clean Energy Groups, [Re: In the Matter of Xcel Eenergys’ 2024-2026 ECO Modification Request Filed January 16, 2026](#), filed February 10, 2026 in Docket No. E,G002/CIP-23-92.

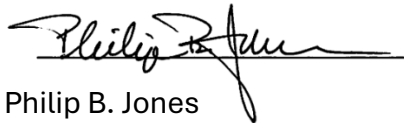
programs to enhance customer outreach, improve energization processes and timelines, and inform utility load forecasting and planning.

Conclusion

In its Modification Request, Xcel has proposed thoughtful programs that are well-designed to support customers in switching from an internal combustion vehicle to an EV. Importantly, Xcel proposes to support vehicle fuel-switching in a way that maximizes alignment with the company's sphere of influence and ratepayers' interests, while meaningfully addressing a top barrier to EV adoption. We encourage you to reject Staff's proposal of reclassification and instead authorize the addition of these two programs to Xcel's Efficient Fuel-Switching portfolio within its 2024-2026 ECO Plan.

Thank you for the opportunity to provide comments, and for your time and attention to these important programs.

Sincerely,



Philip B. Jones
Executive Director



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