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Assistant Commissioner of Regulatory Analysis
Minnesota Department of Commerce
Division of Energy Resources
85 7th Place East, Suite 500
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Re: Auto Innovators' Comments on Xcel's ECO Modification Request, Docket No. EG002/CIP-23-92

Auto Innovators represents the full auto industry value chain, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector¹.

I. Widely available public charging infrastructure drives EV adoption.

Minnesota currently has 87,344 registered EVs, 2,143 level 2 charging ports, and 1,012 DCFCs². The state aims to have 20 percent of light-duty vehicles to be EVs by 2030³, and has estimated it will need 48,000 level 2 ports and 4,000 DCFCs to support that target⁴. The rollout of public EV charging does not meet customers' needs today and falls short of what's needed to accelerate EV adoption. Plug In America's (PIA) 2025 Driver Survey shows that nearly 36 percent of respondents were concerned about charger availability when purchasing an EV⁵. Nearly 35 percent were concerned about charger reliability, which was a 3 percent increase from the 2024 survey. JD Power's 2025 U.S. EV Vehicle Consideration Study reinforces this—41 percent of new vehicle shoppers said they were very unlikely to consider an EV, citing lack of charger availability⁶. Our members hear these concerns directly from prospective EV consumers. Lack of available and reliable charging infrastructure can greatly inhibit EV deployment.

II. Robust incentives are critical to accelerate charging station build out.

Charging stations, especially DCFCs, require significant upfront capital investment. Although EV adoption is steadily increasing, infrastructure providers still face significant risk that charging stations will not have enough utilization to re-coup their investments in a timely manner and support ongoing operational

¹ Alliance for Automotive Innovation. (n.d.). *Resources and insights*. <https://www.autosinnovate.org/resources/insights>

² <https://atlaspolicy.com/evaluatemn/>

³ Minnesota Department of Transportation. *Electric Vehicle Infrastructure Needs Assessment*. July 2025

⁴ *Id.*

⁵ Plug In America. (2025). *EV Driver Survey*. Retrieved from <https://pluginamerica.org/wp-content/uploads/2025/06/2025-EV-Driver-Annual-Survey-Report-1.pdf>. Page 12.

⁶ J.D. Power. (2025, February 27). *Despite improvements in reliability and availability, public charging remains top stumbling block to EV adoption*. <https://www.jdpower.com/business/resources/despite-improvements-reliability-and-availability-public-charging-remains-top>

costs. Incentives mitigate these risks and encourage private investment in infrastructure build out.

States with high EV adoption rates achieved this in part because they invested significantly in charging infrastructure. For example:

- Charge Ahead Colorado: Covers \$35K-\$40K per 100+ kW DCFC port⁷
- DCFC Plazas Program (CO): Covers 80% of project costs for 150 kW DCFCs⁸.
- Fast Charge California: Provided \$55K per 150-275 kW DCFC port and \$100K per 275+ kW⁹.
- It Pay\$ to Plug In (NJ): Covers \$100K per 150+ kW DCFC port¹⁰.
- New York: Utilities cover 50-100% of DCFC make-ready infrastructure costs¹¹.
- Driving a Cleaner Illinois Covers 80% of installation costs¹²
- National EV Infrastructure Program: Covers 80% of total project costs¹³.

These are exemplary programs that significantly accelerate infrastructure build out because they greatly reduce capital risk. In many cases, these programs have been significantly oversubscribed, further indicating their success.

III. The methodology proposed is not appropriate, would drastically reduce available incentive funding, and risks undercutting interest in the program.

The Department of Commerce has proposed categorizing these incentives as an energy efficiency measure instead of an efficient fuel switching program, requiring Xcel to use a related energy efficiency formula to calculate the level of incentive offered. Not only does the Technical Reference Manual's methodology exclude DCFC¹⁴, but this approach would significantly reduce the level of incentive Xcel can offer per charging port, which risks significantly hamstringing interest in the program. As indicated above, incentives must be robust on a per port basis to generate significant program interest. Otherwise, the state risks private investment moving elsewhere.

Furthermore, categorizing these investments as an energy efficiency program is not applicable to EV charging stations. Charging station build out encourages drivers to switch from a gas- or diesel-powered vehicle to one powered by electricity. In this instance, drivers are moving from one fuel source to another entirely as opposed to switching out a charging station for a more energy efficient one. It's not clear to our members how energy efficiency is applicable as a concept to determining the incentive amount necessary to scale up the EV charging market and subsequently EV adoption. This risks confusion and potential disinterest in the program.

In conclusion, we respectfully urge the Department to reconsider its proposed decision and instead allow Xcel to follow through on its original program proposal, which holds significantly more promise to incentivize EV charging deployment. Otherwise, the state risks undermining its EV adoption goals.

⁷ [Charge Ahead Colorado](#)

⁸ [DCFC Plazas Program](#)

⁹ [Fast Charge California](#)

¹⁰ [It Pay\\$ To Plug In](#)

¹¹ [New York Make-Ready Programs](#)

¹² [Driving a Cleaner Illinois](#)

¹³ [National EV Infrastructure Program](#)

¹⁴ State of Minnesota Technical Reference Manual for Energy Conservation Optimization Programs. January 2026. Pages 694-695. <https://mn.gov/commerce-stat/trm/releases/5.0.pdf>

Respectfully submitted,

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