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August 29, 2022

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

Re: Xcel Energy Electric Vehicle Infrastructure Petition (Docket# 22-432)

Dear Mr. Seuffert,

NFIB Minnesota believes the best course for ratepayers and stakeholders is to consider Docket M-22-432 (EV Infrastructure Petition) separately from Docket GR-21-630 (MYRP).

Small business ratepayers have a strong interest in both, which propose a combined cost to Xcel customers of **over \$1 billion**. We believe the expense and complexity of each deserve rigorous scrutiny that can only be achieved in separate processes. We look forward to providing more detailed comments on the EV Infrastructure Petition at the appropriate time.

Many factors demonstrate the EV Infrastructure Petition should be considered separately, including: the controversial nature of the EV Infrastructure Petition, the significant added cost proposed in the EV Infrastructure Petition, and the length of time since the last full examination of an Xcel MYRP.

Xcel's EV Infrastructure petition puts mom and pop stores in a position of having to fund their larger, investor-owned competition. Their spending plan presents many challenging financial and public policy questions that are best examined in a contested case hearing.

At a minimum, the PUC, ratepayers, and stakeholders must better understand:

- i) how Xcel's proposed EV infrastructure spending plan would impact the competitive market for EV charging,

- ii) how the proposed investments fit with existing public sector and private sector plans for EV infrastructure spending,
- iii) whether EV adoption models are realistic, and
- iv) whether advances in vehicle technology would render all or part of Xcel's proposed investments obsolete long before their useful life expires.

Xcel's MYRP proposes \$677 million in increased costs for ratepayers. The EV Infrastructure Petition would increase the price tag by \$390 million – nearly 60 percent more – **bringing the total proposed cost to ratepayers to over \$1 billion**. The amount of proposed cost recovery deserves separate and thorough consideration.

Xcel Energy's most recent effective MYRP was filed in 2015, approved in 2017, and covered years 2016 through 2019. Since then, Xcel has requested, and the Minnesota Public Utilities Commission (PUC) approved, two "stay-outs" that deferred consideration of a full MYRP while increasing costs for small businesses and other Xcel customers. Ratepayers are overdue for a full accounting of Xcel's spending and operations.

For the reasons outlined above, NFIB Minnesota strongly encourages the PUC to subject M-22-432 to rigorous examination in a separate proceeding.

About NFIB Minnesota. We represent over 10,000 small businesses in every corner of the state. Our mission is to advocate for Main Street: our average member has 10 employees and gross annual revenue of \$500,000, and nearly 90% have fewer than 20 employees.¹

NFIB establishes its policy positions based on a one member-one vote philosophy. Our members have equal voice regardless of size and are surveyed regularly on state and federal matters important to small business.

Thank you for considering the small business perspective.

Sincerely,



John Reynolds
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¹ "Who NFIB Represents," National Federation of Independent Business, <https://www.nfib.com/about-nfib/what-is-nfib/who-nfib-represents/>, accessed 8/19/2022