

March 6, 2018

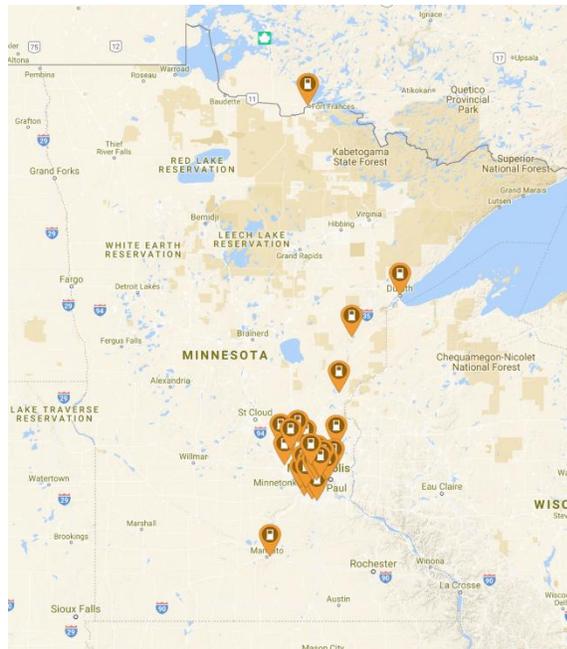
Commissioner John Linc Stine
Minnesota Pollution Control Agency
520 Lafayette Road N
St. Paul, MN 55155

Dear Commissioner Stine,

Drive Electric Minnesota (Drive Electric MN), a private-public partnership working hard to make Minnesota a national leader in the adoption of electric vehicle (EV) technology and charging infrastructure commends the MPCA for the great process that incorporated stakeholder input following the Volkswagen Settlement announcement. Drive Electric MN largely supports the elements laid out in the Volkswagen Settlement Beneficiary Mitigation Draft Plan.

As indicated through the stakeholder process, the EV community demonstrated a strong interest in EV charging and EV trucks and buses. Exciting opportunities exist for EV trucks and buses including deployment of transit buses in Duluth and the Twin Cities, EV school buses in Lakeville, and EV bus manufacturing in St. Cloud and Crookston. Drive Electric MN commends the MPCA on listening to stakeholders and carving out a dedicated grant program for heavy-duty EVs while also allowing them to compete in other grant programs.

Drive Electric MN also supports targeting 15% of the funds toward EV charging stations. However, **we**



DC fast chargers in Minnesota as of March 16, 2018. Does not include Tesla Superchargers.

recommend that the minimum requirement for DC fast chargers is changed to 50kW to support the buildout of more chargers. While it's understandable that the minimum requirement is in place to accommodate future needs of EVs and reduce the time it takes to charge, Minnesota currently lacks the necessary fast charging infrastructure to increase EV adoption (displayed in the map to the left). Thus, Minnesota is in a critical state to build out the network at a lower 50-kilowatt capacity during Phase 1 and build up to 150-kilowatts in subsequent phases when the demand for charging will be higher. Lower speed 50kW DC fast chargers offer a considerable cost savings (\$60,000) compared to higher 150kW DC fast chargers (\$170,000), enabling more chargers to be built using the same funds. Using the same guidelines proposed in the Draft Plan while reducing the minimum requirement to 50kW would allow 33 DC fast chargers to be installed around the state, helping

to tackle the critical range anxiety barrier commonly cited among prospective EV adopters. It should be noted that while Drive Electric MN partners stress the importance of building out the network, we feel it is also crucial to create a resilient network, requiring that 50kW chargers be installed with upgrades in mind. For example, installing infrastructure to allow for additional plugs at the same station coupled with a Level 2 backup will help establish a resilient network, particularly along highway corridors where there's a critical need to charge vehicles prior to reaching their destination.

Drive Electric MN partners are excited to collaborate, identify cost-share, build partnerships, and make this program a success for cleaner air in Minnesota.

Sincerely,

Drive Electric MN Partners:

American Lung Association in Minnesota
Center for Energy and the Environment
ChargePoint
Connexus Energy
Dakota Electric Association
Elk River Municipal Utilities
Fresh Energy
General Motors
Great River Energy
Greenlots

Kline Nissan
Minnesota Auto Dealers Association
Minnesota Plug in Vehicle Owners Circle
Minnesota Pollution Control Agency
Minnesota Power
Nissan North America
Otter Tail Power Company
PlugInConnect
Xcel Energy
ZEF Energy