

9/16/2026 additional Public Comments of John Purdy under [ORD 26-41](#) and [26-44](#) Electric Franchise and Fees.

Dear Saint Paul City Council, City Clerk, Mayor and Northern States President Bria Shea,

Please accept one further comment in regard to franchise fees applicable to Electric Vehicle Charging Stations.

Xcel Electric Rate Book MPUC No. 2 contains the following rate classes for purposes of charging electric vehicles:

1. RESIDENTIAL ELECTRIC VEHICLE SERVICE A08 – MPUC No. 3, Section 5.5-5.6
2. RESIDENTIAL EV ACCELERATE AT HOME PAY AS YOU GO SERVICE A79, A80, AND A81 - Section 5.7 - 5.7.2
3. RESIDENTIAL EV ACCELERATE AT HOME VOLUNTARY SERVICE A76, A77 -Section 5.8
4. RESIDENTIAL EV ACCELERATE AT HOME SUBSCRIPTION SERVICE A82, A83, A84 – Section 5.8.1 – 5.8.3
5. ELECTRIC VEHICLE FLEET PILOT SERVICE A87, A88, A89 – Section 5.51 – 5.51.3
6. ELECTRIC VEHICLE PUBLIC CHARGING PILOT SERVICE A90 – Section 5.52 – 5.52.3
7. MULTI-DWELLING UNIT ELECTRIC VEHICLE SERVICE PILOT A91, A92, A93 – Section 5.52.4 – 5.52.6
8. ELECTRIC SERVICE PUBLIC CHARGING STATION CODE A94 – 5.52.7 – 5.52.8

Regarding **Items 1 through 4** above, Rate Codes A08, A79, A80, A81, A76, A77, A82, A83 and A84 all appear as Residential. But the use of electricity for recharging electric vehicles does not appear to fit Xcel's definition of Residential Customer as published in Xcel Rate Book [MPUC No. 2, Section 4.2](#).¹

“A residential customer is one using electric service for domestic purposes in space occupied as living quarters. Domestic purposes or uses are domestic lighting, heating, cooking, and power service.”

If electric vehicle charging occurs outside of the living quarters, such as in an attached or unattached garage or an outside car portal, does the City Council or Xcel consider this situation to be a “domestic purpose in space occupied as living quarters” and which franchise fee rate is then assignable, 5%, 5.5%, 7.25% or 7.26%?

Regarding **Item 6** above, Rate codes A87, A88 and A89 appear to apply to City-Owned charging stations as provided under [Chapter 441](#) of the Saint Paul Legislative Code, as controlled by [Ordinance 25-53](#).

¹ MPUC No. 2, Section 4.2 is published at this link:
https://www.xcelenergy.com/staticfiles/xcel/PDF/Regulatory/Me_Section_4.pdf

Because these City-Owned charging stations are neither Residential nor Non-Residential but are Governmental, do they escape classification within the proposed Franchise Fee ORD 26-53 Exhibit 1?

If so, does the “catch-all” rate contained in Section 2.1 of the ORD 26-41 of 5% for customer classes not listed on Appendix A apply to City-owned charging stations?

Regarding **Item 7** above, Rate codes A91, A92 and A93 appear to apply to Multi-Dwelling charging stations. Can the City Council or Xcel confirm if such Multi-Dwelling charging stations will receive the Non-Residential franchise fee rate of 7.25% or 7.26%, or if the Residential 5.5% rate will apply?

Regarding **Item 8** above, Rate code A94 applies to Xcel-owned charging stations. They may be neither Residential or Non-Residential but similar to the City-owned charging stations above. Xcel’s new [Service Center](#) at The Heights in St. Paul includes provisions for charging stations that support Xcel’s plans to transition its entire fleet to electric vehicles by 2030.

Can the City Council or Xcel confirm which franchise fee rate will apply, the “catch-all” 5%, or the 7.25% or 7.26% Non-Residential rate?

It may be possible that Xcel may not actually charge themselves any cost for the use of their own electricity if the new Service Center charging stations are not available to the public. Consequently, there would be no “Gross Revenue” produced because no sale occurs; hence no franchise fee. Can the City Council or Xcel comment on this?

Lastly, if it is the intention of the City Council to charge City and Xcel owned charging stations this “catch-all” 5% rate, can the city count on it being correctly applied when the “catch-all” rate is not expressed within Exhibit 1 of ORD 26-44?