

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission :
On Its Own Motion : No. 12-0212
Certification Requirements Applicable to Vendors :
that Install Electric Vehicle Charging Stations :

**COMMONWEALTH EDISON COMPANY’S INFORMAL COMMENTS RESPONDING
TO STAFF’S QUESTIONS CONCERNING SECTION 16-128A (d) OF THE ACT**

Commonwealth Edison Company (“ComEd”) submits these Informal Comments pursuant to the May 18, 2012 invitation circulated by the Illinois Commerce Commission (“Commission”) Staff. ComEd appreciates the opportunity to respond and is prepared to discuss this response with Staff and the parties to this proceeding. ComEd’s response follows the Staff’s outline of questions.

I. DEFINITIONS

What definition, if any, should be included in the rule to define an “electric vehicle charging station”?

If HB5071¹ becomes law, there is no need for the definition of “electric vehicle charging station” as that term is defined in the bill.

If HB5071 does not become law, “electric vehicle charging station” should be defined as set out in HB5071.

What definition, if any, should be included in the rule to define a “vendor that installs an electric vehicle charging station”? Can a single individual be classified as a “vendor”?

If HB5071 becomes law, a definition of “vendor” is not needed as that term is deleted.

If HB5071 does not become law, “vendor” should be defined as “Persons or entities that install, maintain, or repair electric vehicle charging stations.”

¹ HB5071 was passed by both houses of the Illinois General Assembly on May 31, 2012.

What definition, if any, should be included in the rule to define “self-installer” of electric vehicle charging station? Does a self-installer fall under the definition of “vendor”?

If HB5071 becomes law, there is no need for the definition of “self-installer” as that term is defined in the bill.

If HB5071 does not become law, “self-installer” should be defined as “an individual who (i) leases or purchases an electric vehicle charging station for his or her own personal use and (ii) installs an electric vehicle charging station on his or her own premises without the assistance of any other person.”

What definition, in any, should be included in the rule to define “install.” Does plugging a charging station cord into an outlet on the premises constitute “installing an electric vehicle charging station”?

The term “install” should be defined as the activities and actions required to connect, in accordance with applicable building and electrical codes, the conductors, the electric vehicle connectors, attachment plugs, and all other fittings, devices, power outlets, or apparatuses mounted specifically for the purpose of delivering energy from the premises wiring to the electric vehicle charging station.

Plugging a charge station cord into an electrical outlet does not constitute installing an electric vehicle charging station, provided the electrical outlet does not exceed a rated voltage of 120v.

What definition, if any, should be included in the rule to define “commercial use” of an electric vehicle charging station? Does commercial encompass only those installations that offer services to the public? Would the definition include use of charging stations owned by a fleet owner for limited purposes of charging its own fleet vehicles?

Commercial use should encompass electric vehicle charging stations used to offer services to the public as well as those used to charge vehicles that are part of a commercial fleet or to provide charging to EVs owned by employees or patrons of a commercial retail customer.

What other definitions, not referenced above, should be included in the rule?

None

II. APPLICABILITY

Should the Commission certify all vendors that install electric vehicle charging stations?

Yes, and if HB5071 becomes law, the Commission should require that all persons and entities that install, maintain or repair electric vehicle charging stations obtain Commission certification before providing service.

Should self-installers of electric vehicle charging stations be exempt from certification?

Yes. Self-installers should not be required to obtain Commission certification prior to installing such facilities. However, all electric vehicle charging stations installed by self-installers must conform to all applicable building and electrical codes and must meet all recognized industry standards to the same extent as electric vehicle charging stations that are installed by certified installers.

Should installers of electric vehicle charging stations that are not for commercial use be exempt from certification?

Only self-installers should be exempt. Any other person or entity that installs, maintains or repairs electric vehicle charging stations, even for a non-commercial installation, should be subject to certification.

Should installers of electric vehicle charging stations be subject to certification requirements based upon the electrical force or voltage that is transferred to the electric vehicle? For example, should certification only be required for level 3 or DC fast charge station installations?

No. All persons or entities that install, maintain or repair electric vehicle charging stations should be subject to certification.

Should installers of electric vehicle charging stations be subject to certification requirements based upon the number and type of installations performed? Should certification only be required for groupings of level 2 charging station installations?

No. Certification should not be based on the number and type of installations performed or limited to groupings of Level 2 charging stations.

What other types of installations, not reference above, should be exempt from certification requirements?

Only self-installers should be exempt.

III. REQUIRED APPLICATION FILINGS AND PROCEDURES

Should certified installers be required to file notices of installation of each charging station and its location? How often – quarterly? After each installation? If so, what information should be provided in such notices?

Yes. HB5071 provides that an installer must notify the utility in writing both before and after installation of a charging station. This requirement should be adopted whether or not HB5071 becomes law, provided the rated voltage from the premises wiring to the electric charging station exceeds 120v.

The installer should provide the utility with the following information: 1) the address where the electric vehicle charging station was installed; 2) the number of electric vehicle charging stations the installer installed at that address; and 3) the number of volts and amps associated with each electric vehicle charging station the installer installed.

Should the customer have to provide the ICC or their electric utility with a certification that the entity/vendor installing the charging station was an entity certified by the ICC to install EV charging stations? If so, what information should be provided in such notices?

Yes, HB5071 provides that the customer shall provide the utility with a certification that any electric vehicle charging station owned, maintained or repaired by the customer was installed by a self-installer or by an entity certified by the ICC and in good standing. This certification should be provided within 30 days of the completion of installation and include the name, address, phone number and ICC certificate number of the entity, if not a self-installer, that installed the station. This requirement should be adopted whether or not HB5071 becomes law.

Is it necessary for the Commission to issue an order granting or denying an application for a vendor to be certified to install and EV charging station?

Yes, it is necessary for the Commission to issue an order granting or denying an application for a vendor to be certified to install an EV charging station

Are there circumstances under which the Commission should require vendors to amend their certificates? If so, what are such circumstances?

Yes, if any of the material representations contained in any documents submitted by the entity for certification change in any material respect.

IV. GENERAL CERTIFICATION REQUIREMENTS

Should installers meet adequate training, financial, and competency requirements to be certified? If so, should certification requirements vary based upon the electrical force or voltage that is transferred to the electric vehicle or according to the number and type of installations performed?

Yes, installers should be required to meet the requirements set out in HB5071, whether or not that bill becomes law. No, the certification requirements should not vary.

Should installers be licensed to do business and be bonded in the State of Illinois in order to receive certification?

Yes, all installers, other than self-installers, should be licensed to do business and be bonded in the State of Illinois in order to receive certification.

How should the Commission ensure that installers that get certified have the requisite knowledge, skills, training, experience, and competence to perform functions in a safe and reliable manner?

Requiring the employment of licensed and bonded electrical contractors to perform the required work is sufficient.

Should the Commission impose reasonable certification fees and penalties on installers for failing to comply with its certification requirements?

Yes, the Commission should impose reasonable certification fees and penalties on installers for failing to comply with its certification requirements.

Should all installers conform to applicable building and electrical codes?

Yes, all installers, including self-installers, should be required by the Commission to conform to applicable building and electrical codes.

Should all certified installers be required to ensure that all EV charging stations they install meet recognized industry standards as the Commission deems appropriate (e.g., NEC, IEEE, EPRI, DTE, UL, SAE, NIST)?

Yes, all certified installers and self-installers should be required to ensure that all EV charging stations they install meet recognized industry standards as the Commission deems appropriate.

June 8, 2012