



## IBEW-NECA TECHNICAL INSTITUTE

of the Electrical Joint Apprenticeship and Training Trust

Informal Comments of the International Brotherhood of Electrical Workers (IBEW) and Affiliated Contractors

To: John Sagone, Eric Schlaf, Jennifer Hinman, Illinois Commerce Commission Staff

Re: ICC rulemaking Docket 12-0212

Date: July 11, 2012

Thank you for the opportunity to submit additional informal commentary regarding 12-0212 Electric Vehicle Charging Station Installer Certification rulemaking. We are addressing our comments in bullet form for the sake of clarity and expediency.

Section- Definitions: Fast charging stations are DC to the vehicle supplied by a voltage of 208 or greater

Section- Definitions: The definition of self- installer should include a limitation to Level 1, 120 volt charging stations

Section- Definitions: The self- installer should not require certification; however circuit ampere capacity is important

Section- Definitions: Applicants should be defined as 'qualified persons' as per the National Electrical Code (NEC), Article 100

Section- Required Application Filings: Applicants should be individuals actually performing the installation not companies or entities

Section- Required Applications Filings: Contractors or businesses providing certified employees should be licensed and bonded and registered with the Illinois Secretary of State

Section- Technical Certification Requirements: Illinois does not currently license individual electricians statewide

Section- Technical Certification Requirements: Electricians should have completed a state or federally registered electrical apprenticeship program with 8000 total hours with a minimum of 720 classroom hours ex. United States Department of Labor Registered Electrician Apprenticeship Program

Section- Technical Certification Requirements: The Electric Vehicle Infrastructure Training Program or equivalent is acceptable. Other EV training programs must provide documentation of training hours that mirror federal and state apprenticeship requirements. The foregoing validates the necessary electrician skill set

Section- Technical Certification Requirements: Years of employment without certification or registered program status is difficult to verify