



MidAmerican Energy
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August 15, 2011

Illinois Commerce Commission
Initiative on Plug-In Electric Vehicles
160 North LaSalle, Suite C-800
Chicago, IL 60101

Dear Commissioners:

MidAmerican Energy Company (MidAmerican) appreciates the opportunity to continue its participation in the Initiative Committee's examination of the impact of plug-in-electric vehicles (PEVs) on utility electric systems.

Attached please find MidAmerican's comments addressing the issues set forth in the Commission's July 15, 2011, Request for Supplemental Comments.

MidAmerican looks forward to further participation in the committee's collaborative effort to position Illinois as a leader in the successful adoption of PEVs.

Sincerely,

A handwritten signature in blue ink that reads "Dean A. Crist". The signature is fluid and cursive, with a prominent star-like flourish at the end.

Dean Crist,
Vice President, Regulation
MidAmerican Energy Company

MidAmerican Energy Company
Response to

Illinois Commerce Commission
Initiative on Plug-In Electric Vehicles

Request for Supplemental Comments

On July 15, 2011 the Illinois Commerce Commission (Commission) initiated a request for supplemental comments as a follow-up to the utilities plug-in electric vehicle initial assessments, response comments, and the Commission's March 9th Policy Committee meeting. In its request, the Commission specifically asked parties to focus and provide comments offering a more detailed analysis, including the public policy goals as well as legal and regulatory analyses surrounding four issue areas, to aid them in determining the appropriate next steps. MidAmerican provides the following comments to the Commission's questions:

- **The appropriate regulatory paradigm (if any) for private and public charging stations.**

For clarity, MidAmerican defines public charging stations to include any charging station that is available for general public use (whether for a fee or not), not simply charging stations owned and/or operated by a governmental entity. MidAmerican defines private charging stations as those available only to the owners of the charging station and others specifically authorized by them (their employees, for example).

As a general matter, MidAmerican does not believe that a separate or different regulatory paradigm is necessary for private or public charging stations. While MidAmerican agrees with the Commission that electric vehicle transportation has the potential of enhancing our national security, propelling our economic growth and reducing carbon dioxide emissions, MidAmerican does not believe that the regulatory paradigm must be altered to accommodate electric vehicle charging.

Public Charging

MidAmerican suggests that the issue of sales for resale should be clarified. As MidAmerican noted in earlier comments, the sale by a public utility to a charging station that resells that electricity to a retail customer may be construed to mean a sale for resale. Therefore, it is possible that the Federal Energy Regulatory Commission would assert jurisdiction over such wholesale transactions. However, if it is established that the providing of charging services for a fee does not constitute a sale for resale, the sales of energy to public charging stations should be provided in the same manner and with the same regulatory requirements as sales of energy and delivery services to any other utility customer. Utility delivery service and bundled rates should be cost based. MidAmerican does not believe that separate end-use rates are needed for public charging. Should experience with load patterns, required utility equipment, or other factors justify a rate design for these customers different than for existing customer classes, the utility should be free to propose a unique rate for public charging. However, it is not appropriate for the rate design to allow subsidization of a public charging rate.

Private Charging

Similar to the comments above, MidAmerican believes that sales of energy to private charging stations should be provided in the same manner and with the same regulatory requirements as sales of energy and delivery services to any other utility customer. MidAmerican does not believe it is necessary to require customers to utilize specific end-use rates for vehicle charging.

- **In order to facilitate the charging of electric vehicles that provides the maximum societal environmental and economic benefits, what modifications (if any) should be made to existing utility rates? In addition, what metering options and charges should be considered while taking into account the existence of competitive retail suppliers?**

MidAmerican believes that time-of-use rates could be designed to encourage charging during off-peak periods. However, MidAmerican does not believe that time-of-use rates need be mandatory. MidAmerican also does not advocate special end-use rates for electric vehicle charging. MidAmerican's experience in other states has found policing end-use rates to be problematic. MidAmerican supports allowing, but not requiring, customers to separately meter electricity used for vehicle charging. When separate metering is utilized, the customer should pay the meter charges applicable to the type of meter installed along with all other charges associated with the rate for the second service. (If meter charges are not separately stated, the customer should pay the basic service charge associated with the second service.)

- **What cost causation and rate design modifications will be required to handle distribution upgrades for increased penetration of higher voltage at-home charging?**

MidAmerican advocates that customers utilize a rate that is appropriate for their load characteristics. Residential customers requiring greater than single phase service to accommodate higher voltage charging should be included in a rate class with similar load characteristics and pay the rates that recover the costs caused by that rate class.

- **Which costs, if any, should be socialized and why (rationale, benefits, etc.)? Assuming there are costs to be socialized, what are the proper methods for such allocation?**

MidAmerican believes that attempting to charge customers for system upgrades that are needed after a customer purchases an electric vehicle would be fraught with problems. Electric loads on a particular section of the distribution system may have increased significantly from the time the circuit was originally constructed for a variety of reasons. MidAmerican does not see any difference between increases in load caused by electric vehicle charging compared to other organic load growth. Load increases caused by the addition of air conditioning and flat screen televisions, or the proliferation of computers or other electronic devices have not been singled out for special treatment. MidAmerican suggests that distribution upgrade costs related to electric vehicle additions be socialized in the same way as are distribution upgrade costs for other organic load growth.