



**To** Jim Zolnierek, Eric Schlaf, and Jennifer Hinman  
Illinois Commerce Commission

**From** Ameren Illinois Company

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**Topic** 12-0212 - Comments Regarding EV Charging Station Installer Certification

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## I. DEFINITIONS

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

Not sure of the specifics, but there needs to be a distinction between vehicles that have on board inverters/devices that change AC current to DC current, and devices connected to the wiring at a premises that perform that function and to which an electric vehicle is connected for recharging.

**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”?**

Yes, a single individual can be classified as a vendor. A vendor is someone who isn't the owner of the premises and who installs EV charging devices for compensation.

**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”?**

No, a self-installer should be defined as the owner of the premises where an EV charging device is installed, and who performs the installation by herself/himself in compliance with local building/electrical codes.

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

No, a charging station is a device permanently wired into the circuitry of a premises. Plugging a cord into an existing wall outlet that has not been modified beyond a change in its voltage is not an operation of a charging station.

**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?**

Going back to my desire that the qualifications for installers be left to local licensing bodies, I don't think that there should be a distinction between the qualifications needed to install a charging station to sell the service to the public, or a charging station to support a fleet of vehicles operated by the owner of a premises, or a charging station installed by a third party at a residence.

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

## II. APPLICABILITY

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

No, the Commission should rely on the existing licensing procedures for electricians currently in place at the local government level.

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

Yes, because it's consistent with the distinction that many if not all communities make on when an individual has to be an licensed electrician. If you do work at your own house, you need to have the work inspected but you don't need to hire it out.

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

No – anyone doing the work for hire needs to be licensed by the local licensing agency.

**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 – see previous answers on the need for consistency with licensing electricians.

**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?**

(See previous answer.)

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

## **I. 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?**

If they have to inform anyone that an EV charging station has been installed, it should occur only after installation is complete, or if the number or voltage of existing stations are changed.

**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?**

While the utility wants to know where EV stations are for reliability purposes, we shouldn't provide any enforcement role for the rule. The largest extent of any enforcement role by the utility should be having the customer identify on the notification form whether the station was self-installed, or it was installed by a licensed electrician and provide the name and license number of the electrician. All we care about are the locations of EV charging stations.

Note that even if we're notified of all EV charging stations, we won't know the locations of customers whose vehicles have built-in inverters that require only that they be plugged into a wall outlet. Requiring utility notification of all EV charging stations won't provide a comprehensive list of all EV owner locations.

**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?**

No, this should be handled at the local government level.

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

No.

## **II. 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?**

(see previous references to using local licensing practices.)

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

(see previous references to using local licensing practices.)

**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?**

(see previous references to using local licensing practices.)

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

Only if no penalties currently exist for persons performing electrical work without a license.

**Should all installers conform to applicable building and electrical codes?**

Yes.

**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)?**

Certified installers should just ensure that the stations are wired correctly and won't cause a fault to the utility's distribution system. It's caveat emptor if someone installs a system that's insufficient or improper for charging vehicles – that's a matter currently covered under contract/consumer law, I would think.