

**Responses of IBEW Local 51 to Staff May 18, 2012 Request for Comments  
Concerning EV Charging Station Installer Certification<sup>1</sup>  
ICC Docket No. 12-0212**

**I. DEFINITIONS**

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

The rule should define “electric vehicle charging station” as any facility or equipment that is used to charge a battery or other energy storage of an electric vehicle.

*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”?*

The rule should define “vendor that installs an electric vehicle charging station” as individuals or entities that perform work on or within an electric vehicle charging station, including, but not limited to, the connection of power to an electric vehicle charging station, and the installation, maintenance, or repair of an electric vehicle charging station.

Yes, a single individual can be classified as a vendor.

*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”?*

The rule should define “self-installer” as an individual who leases or purchases an electric vehicle charging station for his or her own personal use and installs an electric vehicle charging station on his or her own premises without the assistance of any other person.

A self-installer does not fall under the definition of “vendor,” but a single individual who meets the requirements of the above definition is not prohibited from being certified as a “vendor that installs an electric vehicle charging station”.

*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”?*

The rule should define “install” as any work associated with the connection of power to an electric vehicle charging station, and the installation, maintenance, and repair of an electric vehicle charging station.

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<sup>1</sup> Questions from Staff are italicized; Local 51’s answers are in plain type.

As long as the “plugging” of a charging station cord into an outlet is for normal operation of the station it would not fall under the definition of “installing an electric vehicle 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?*

The rule should define “commercial use” as use by any person of an electric vehicle charging station not located on his or her premise.

No, “commercial” does not encompass only those installations that offer services to the public.

Yes, the definition of “commercial use” would include use of charging stations owned by a fleet owner for limited purposes of charging its own fleet vehicles.

*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?*

Yes.

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

Yes, but it must be ensured by certification that a self-installed electric vehicle charging station is not used for any commercial purpose.

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

No.

*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?*

*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?*

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

None.

### **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?*

Certified installers should be required to file notices of installation of each charging station and its location monthly. Included in the notices should be the actual completion date of the installation, the location of the individual station(s), the number of stations at each location if there are multiple stations that are contiguous to each other on the same premises, the type (force, voltage, level, fast charge, etc.) of station(s), and the entity the installation was performed for.

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, the customer should have to provide the ICC and 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. Included in such notices should be the date of the intended installation, the actual completion date of the installation, the identity of the certified entity/vendor performing the installation, the location of an individual station(s), if there are multiple stations that are contiguous to each other on the same premise the number and location of all stations must be identified, the type (force, voltage, level, fast charge, etc.) of station(s), and an identification/nomenclature system for each station.

*Is it 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?*

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. If the Commission does not, it should establish something similar to the certification process for Meter Service Providers or Alternative Retail Electric Suppliers.

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

Yes, there are.

#### **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.

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

Yes.

*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?*

The Commission should require certified documentation in accordance with subsection (a) of 16-128 and 16-128A of the Act from individual installers, vendors and entities.

IBEW has attached, in a separate document, the standards it believes should apply to ensure that installers have the requisite knowledge, skills, training, experience, and competence to perform functions in a safe and reliable manner.

To the extent the work involved occurs on the power line side of the customer meter, the same standards IBEW has proposed to apply to installers of distributed generation facilities should apply equally here. A copy of those standards is also attached, for reference.

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

Yes.

*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)?*

Yes.

## **IBEW Pertinent Information**

### **ICC Docket #12 – 0212**

#### **Certification of Installers of Electric Vehicle Charging Stations (Electrician/Wireman Standards)**

1. Any entity or a person that installs an electric vehicle charging station and/or the necessary equipment to provide power to a residential, commercial, or industrial customer for electric vehicle charging stations shall provide a DOL certification of satisfactory completion of a DOL approved and registered electrician/wireman apprenticeship program for the entity's employees who will be performing the installation or person performing the installation (self installers not included).
2. The DOL approved and registered electrician/wireman apprenticeship program must provide for a minimum of 8000 hours of on-the-job-training and a minimum of 900 hours of classroom training.
3. The on-the-job-training must include time in various work processes including but not limited to the following processes:

Project Layout and Planning

Underground Installations

Thinwall and Rigid Conduit Systems

Installation of Services, Switchboards and Panels

Motor Control Center Installation

Installing, Splicing & Terminating Wires and Cables

Control System Installation

Installing & Programming Logic Controllers

Installing and Terminating Transformers

Service and Troubleshooting

4. The DOL approved and registered electrician/wireman apprenticeship program must include training in OSHA related safety training, or State or Local standards that have been found to be at least as effective as the Federal Standards. Other safety training requirements are satisfactory completion of CPR/First Aid training including copies of current CPR/First Aid cards and successful completion of an OSHA approved 10-hour Construction Safety Course.

**IBEW Pertinent Information**

**ICC Docket #12 – 0213**

**Certification of Installers of Distributed Generation Facilities**

**(power line side of a meter)**

1. Any entity or a person that installs distributed generation facilities shall provide a DOL certification of satisfactory completion of a DOL approved and registered line apprenticeship program for the entity's employee(s) who will be performing the installation or person(s) performing the installation (self installers not included).
2. The DOL approved and registered line apprenticeship program must provide for a minimum of 7000 hours of on-the-job-training and a minimum of 500 hours of classroom training. The program must include training in OSHA related safety training, or State, or Local standards that have been found to be at least as effective as the Federal Standards.
3. The DOL approved and registered line apprenticeship program must include satisfactory completion of CPR/First Aid training including copies of current CPR/First Aid cards. The program must include successful completion of an OSHA approved 10-hour Construction Safety Course.