



## ILLINOIS COMMERCE COMMISSION

---

October 5, 2011

Dear Plug-In Electric Vehicle Initiative Stakeholders,

Illinois Commerce Commission Chairman Doug Scott and Commissioner Erin O'Connell-Diaz invite interested parties to an organizational meeting for the next phase of the Illinois Commerce Commission's Initiative on Plug-In Electric Vehicles. The meeting will be held on October 13th at 3pm at the Illinois Department of Commerce and Economic Opportunity's office in the Thompson Center (100 W. Randolph St., Suite 3-400, Chicago)<sup>1</sup> following the meeting of the Electric Vehicle Advisory Council coordinated by DCEO.

To date, the Initiative has received assessments from Ameren, ComEd, and MidAmerican on the impact of the introduction of Plug-In Electric Vehicles (PEVs), comments on those assessments from wide range of stakeholders, and a subsequent set of comments from utilities and stakeholders to follow-up questions asked by the Commission. The Initiative has also held two Policy Committee meetings to discuss the issues discussed in those comments. See: <http://www.icc.illinois.gov/electricity/pev.aspx> for more information on these activities.

The Initiative now plans the following next steps.

First, the Initiative is requesting that interested parties participate in informal workshops to aid the Commission on five specific issues: (1) Defining the scope of what waivers (if any) to the IDC rules would facilitate utilities' role in facilitating the adoption of PEVs and related services; (2) Developing customer education & outreach plans; (3) Modeling and assessment of potential localized reliability impacts; (4) Expanding PEV rate options in order to improve current distribution, transmission and generation asset utilization, and to prevent unnecessary and duplicative investment in infrastructure for on-peak charging; and (5) Developing a petition to the Commission to clarify the legal status of public charging stations. The attached document outlines in more detail the specific issues the Commission is interested in for each of these topics.

Second, the Commission will be preparing a Preliminary Report that summarizes the activities of the Initiative and the comments and opinions offered by various parties. This Preliminary

---

<sup>1</sup> Springfield participants can attend via videoconference at DCEO's office at the Ridgely Building, 500 E. Monroe St., 4<sup>th</sup> Floor. There is also a call-in number available, 1-888-398-2342, Access Code: 5826935.

Report will be presented to the newly formed Electric Vehicle Advisory Council to aid in the development of their report to the General Assembly. The Commission will also prepare a Final Report of the Initiative upon completion of the informal workshops.

The Commission requests that parties interested in participating in the workshops attend the October 13 meeting to discuss how to organize these workshops. Due to limited resources, the Commission will convene this first meeting but would like participants to organize subsequent meetings (or if appropriate, email discussions in lieu of physical meetings) and for each topic area choose a volunteer facilitator. The Commission requests a report on each topic by December 31<sup>st</sup>. While the Commission hopes that participants can reach consensus on these issues, if consensus is not reached, the Commission requests that the reports outline and summarize the differing positions.

The Commission appreciates all the hard work that stakeholders have put into the Initiative to date, and looks forward to working on these next steps.

Sincerely,

Doug Scott  
Initiative Co-Chair

Erin O'Connell-Diaz  
Initiative Co-Chair

**Illinois Commerce Commission  
Initiative on Plug-In Electric Vehicles**

**Suggested Informal Workshop Topic Areas**

**General Guidelines**

The Commission requests that workshop participants explore the following five issues. While the Commission has identified these issues and the scope described below, this is an informal process and participants should not feel strictly bound to the exact topics on which the Commission has requested feedback. If workshop participants determine that there are issues relating to these topics that they would like to additionally report back to the Commission on, that will be acceptable.

As mentioned in the invitation letter, while the Commission hopes that participants can reach consensus on these issues, if consensus is not reached, the Commission requests that reports from the workshop process outline and summarize the differing positions.

Finally, the Commission notes that these suggested topic areas and approaches are merely advisory, and the Commission's interest in them is in no way a statement as to the likely disposition of them by the Commission in any docketed proceedings that result from these workshops.

**(1) Defining the scope of what waivers (if any) to the IDC rules would enhance the utilities' role in facilitating the adoption of PEVs and related services**

The Commission is concerned that aspects of the rules governing ComEd and Ameren as Integrated Distribution Companies (see Title 83, Sections 452.230 and 452.240 of the Illinois Administrative Code) may limit their ability to play a role in facilitating the adoption of PEVs. It therefore may be necessary to consider if a waiver to the IDC rules would allow for appropriate participation by utilities while not hampering the ongoing development of a competitive market for PEV-related programs and services. If workshop participants are interested in pursuing this topic, they may work together to define the scope and parameters of a waiver request that could subsequently be filed by Ameren and/or ComEd.

**(2) Developing customer education & outreach plans**

The introduction of PEVs presents a wide range of customer education and access to information challenges. To best overcome these challenges, and for customers to maximize the economic and environmental benefits of electric vehicles, the Commission sees a need for customer education and outreach plans.

While interactions between a potential PEV buyer and the automobile dealer/manufacture are outside of the Commission's purview, interactions between a PEV purchaser and the local electric utility related to the installation of at home charging equipment and to the consideration of rate options are of great interest to the Commission. Thus, such plans could consider what role utilities, NGOs, environmental organizations, consumer advocacy organizations, and others with the ability to engage in consumer education can and should play in the customer education process. Such plans could also confront what role PEV dealers and manufacturers play in the customer education process. Activity related to education and outreach is underway in other states, and this workshop topic would be well informed by parties giving consideration to the best practices from other jurisdictions.

### **(3) Modeling and assessment of potential localized reliability impacts**

Based on the assessments and comments the Initiative has received, there do not appear to be grid-scale reliability issues at any level of PEV market penetration for the foreseeable future. The Commission remains concerned about any potential for localized reliability issues. At the August 23<sup>rd</sup> Initiative meeting, participants discussed approaches to better model the issue. The Commission is interested in having workshop participants further develop ideas on how to attain a stronger understanding of the potential for PEV-driven localized reliability challenges -- including at what specific levels of local PEV penetration any such challenges would occur -- and learning more from the utilities concerning how any such challenges would be addressed.

### **(4) Expanding PEV rate options in order to improve current distribution, transmission and generation asset utilization and to prevent unnecessary and duplicative investment in infrastructure for on-peak charging**

Current statutory and/or regulatory barriers may impede broad availability of dynamic pricing options that could prevent negative systemic impacts from at home charging of PEVs at peak load times. The Commission would be interested in proposals for statutory solutions. If such solutions are needed, stakeholders may wish to provide an analysis and assessment of the potential for dynamic, real-time or time-of-use pricing to prevent or disincent home-charged PEVs from contributing to peak-load congestion and ancillary service power needs, otherwise negatively affecting energy efficiency and/or other programs, and generally increasing the need for existing generation, transmission or distribution system infrastructure upgrades.

### **(5) Developing a petition to the Commission to clarify the legal status of public charging stations**

There has been general agreement among parties to the Commission's Initiative on Plug-In Electric Vehicles that publicly-available charging stations should be deemed competitive services and therefore not be considered as public utilities. Many commenters requested a

declaratory statement from the Commission to this effect, but the Commission does not appear to have authority under the Public Utilities Act to make a binding declaration on its own initiative.

Under Title 83, Section 200.220 of the Illinois Administrative Code, parties may petition the Commission for a declaratory ruling with respect to the applicability of any statutory provisions enforced by the Commission. If workshop participants are interested in pursuing this path, they may work together to agree on the content of the petition and to select a party to make the filing.