

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission :
On Its Own Motion :
 : No. 12-0212
Certification Requirements Applicable to Vendors :
That Install Electric Vehicle Charging Stations :

VERIFIED COMMENTS OF COMMONWEALTH EDISON COMPANY

Commonwealth Edison Company (“ComEd”) submits these Comments to the Illinois Commerce Commission (“Commission”) on the Proposed Rule on Certification Requirements Applicable to Vendors that Install Electric Vehicle Charging Stations, as reflected in the Appendix to the Commission’s First Notice Order, entered November 8, 2012.

ComEd seeks to substantively comment only on Section 469.120(a), Obligations of Electric Utilities, IMRs and Retail Customers.¹ The language amendments related to these comments are set forth in Attachment A to these Comments.

Comment Applicable To Part 469.120

ComEd proposes several amendments to Part 469.120(a) in order meet the requirements of the Public Utilities Act (“PUA), and to better define the information requirements necessary to confirm that an electric vehicle charging station installer, maintainer or repairer (“IMR”) has obtained, and is presently, a Commission-certificated IMR. First, ComEd proposes amending the language in Section 469.120 (a)(1)(A) to specify that an installing entity provide the servicing utility with its business name, address and phone number. The amendment seeks to eliminate any ambiguity surrounding what “contact information” is necessary to present to the utility.

¹ ComEd proposes one typographical change in the definition of an electric utility, as set forth in Attachment A.

Second, ComEd proposes a new subsection 469.120(a)(1)(B), which requires the IMR to demonstrate that it has obtained Commission certification and is in good standing with the Commission. In this way, the rule does not impose the unnecessary obligation on a utility to investigate to confirm the status of an IMR.²

Third, ComEd proposes to strike proposed subsections 469.120(a)(1)(D), (E) and (F). Instead, ComEd proposes a new subsection 469.120(a)(1)(E), which requires the information demonstrating that the EV charging station has been installed. This proposal streamlines the information a utility will need from an IMR, and serves to demonstrate that the work has been completed.

Fourth, ComEd proposes to strike proposed subsection 469.120(a)(2)(C). This proposal streamlines the information a utility will need from an IMR. Additionally, in subsection 469.120(a)(2)(C) ComEd proposes adding the language that the IMR be in good standing with the Commission. In this way, as discussed above, the rule does not impose the unnecessary obligation on a utility to investigate to confirm the status of an IMR.

Finally, ComEd proposes amending Sections 120(a)(3) and (a)(4) to conform to the requirements of Section 16-128A(d) of the Public Utilities Act (“PUA”). 220 ILCS 5/16-128A(d). As currently drafted, these sections impose an obligation on utilities to maintain documentation that a customer self-installer or an IMR meets the requirements of the rule. Section 16-128A(d) of the PUA, however, addresses requirements applicable to vendors that install EV charging stations, stating:

Within 180 days after the effective date of this amendatory Act of the 97th General Assembly, the Commission shall initiate a rulemaking proceeding to

² The subsections following new subsection 469.120(a)(1)(B) are relabeled accordingly, as set forth in Attachment A.

establish *certification requirements that shall be applicable to vendors* that install electric vehicle charging stations.

Id. (emphasis added). Accordingly, it is ComEd's position that the obligation to maintain documentation pursuant to Section 120(a)(3) and (a)(4) is properly placed on the customer self-installer or the IMR.

CONCLUSION

In light of the foregoing, ComEd requests that the above changes be made to the Proposed Rule. The changes are reflected in Attachment A, attached hereto.

Dated: January 10, 2013

Respectfully submitted,

COMMONWEALTH EDISON COMPANY

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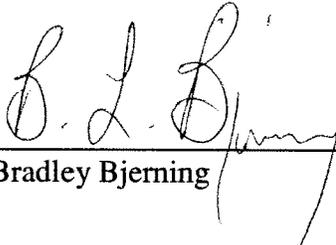
VERIFICATION

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

I, Bradley Bjerning, having been duly sworn, do hereby say and depose under oath based on my personal knowledge as follows:

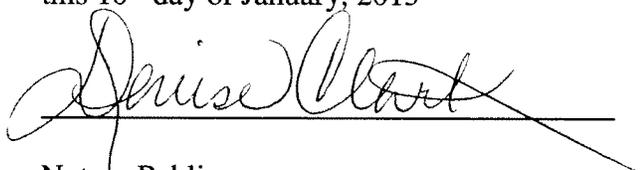
1. I am Principal Regulatory Specialist for Commonwealth Edison Company.
2. I swear and affirm that the facts stated in the foregoing Comments of Commonwealth Edison Company to the Proposed Rule, are true and correct to the best of my knowledge and ability.

FURTHER AFFIANT SAYETH NOT.



Bradley Bjerning

SUBSCRIBED AND SWORN to before me
this 10th day of January, 2013



Notary Public

