

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	Docket No. 12-0212
Certification Requirements Applicable)	
To Vendors that Install Electric Vehicle)	
Charging Stations.)	

**AMEREN ILLINOIS COMPANY'S VERIFIED INITIAL COMMENTS
ON DRAFT PART 469, GOVERNING CERTIFICATION FOR THE INSTALLATION,
MAINTAINANCE OR REPAIR OF ELECTRIC VEHICLE CHARGING STATIONS**

COMES NOW Ameren Illinois Company d/b/a Ameren Illinois (“Ameren Illinois”, “AIC”, or “the Company”), by and through counsel, and in compliance with the Administrative Law Judge’s November 26, 2012 Notice, respectfully submits to the Illinois Commerce Commission (“the ICC” or “the Commission”) its Verified Initial Comments on Draft Part 469 (hereinafter “the EV IMR Rule”).

First and foremost, Ameren Illinois appreciates the opportunity to comment on the EV IMR Rule. As an active participant in the docket’s workshop process, the Company applauds the stakeholders for working together in a collaborative fashion and is pleased to see that Staff has drafted and presented a rule that addresses many of the issues presented in stakeholder discussions.

Ameren Illinois’ primary concern with the proposed rule is tied to the dual notification provisions found in draft Part 469.120. As currently drafted, the EV IMR Rule would require two sets of notifications to the utility (one from the Installer, Maintainer and/or Repairer (“IMR”) and one from the customer) for the same electric vehicle (“EV”) charging station installation. To be clear, Ameren Illinois is concerned about receiving notification of the location of each proposed and/or installed charging station, as well as technical information related to that installation; however, we believe this concern can be addressed by timely receipt of one set of information. In

our experience, multiple forms containing the same information are unnecessarily redundant (increasing administrative burden) and potentially confusing. We would prefer the notifications come from the customer whose internal electric distribution system will serve the EV charging station.

In addition, the Company is concerned with the lack of any direct mechanism for the Company to enforce the utility notification requirements (on either customers or IMRs). Currently, our tariffs provide us with the ability to disconnect any customer whose equipment is causing power quality or reliability issues; however, absent such quality or reliability issues, neither our current tariffs nor the EV IMR Rule provide a direct mechanism for the utility to enforce or remedy lack of notification. The Company would ask Staff to further consider avenues to incentivize utility notification by whichever entity or entities continue to maintain notification responsibilities.

In support of our comments the Company offers as Attachment A to this pleading a document containing AIC's suggested revisions to Part 469.120. Such revisions are presented in "track changes" format for ease of review and clarity and are incorporated by reference herein.

WHEREFORE, Ameren Illinois Company d/b/a Ameren Illinois respectfully submits these comments for review and consideration and requests relief consistent with the comments expressed herein.

Dated: January 10, 2013

Respectfully Submitted,

AMEREN ILLINOIS COMPANY
d/b/a Ameren Illinois

By /s/ Eric Dearmont

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CERTIFICATE OF SERVICE

I, Eric Dearmont, Counsel for Ameren Illinois Company, hereby certify that a copy of the foregoing *Verified Initial Comments* was filed on the Illinois Commerce Commission's e-Docket and was served electronically to all parties of record in this docket on this 10th day of January, 2013.

/s/ Eric Dearmont _____
Eric Dearmont