

Illinois Commerce Commission (ICC) Staff Comments on Ameren IL-TRM Light Duty Electric Vehicle Measure Proposal

June 2024

Staff acknowledges Ameren's perspective that Light Duty electric vehicles should be deemed eligible for inclusion in energy efficiency programs, as per the provision outlined in Section 8-103B(b-25).

For those energy efficiency measures or programs that **save both electricity and other fuels** but are not jointly offered with a gas utility under plans approved under this Section and Section 8-104 or not offered with an affiliated gas utility under paragraph (6) of subsection (f) of Section 8-104 of this Act, the electric utility may count savings of fuels other than electricity toward the achievement of its annual savings goal, and the energy savings value associated with such other fuels shall be converted to electric energy savings on an equivalent Btu basis at the premises.

While this provision [Section 8-103B(b-25)] allows an electric utility to utilize savings from other fuels (subject to a 10% limit) to fulfill its annual target, it is important to note that the measure must demonstrate savings in both electricity and other fuels, and not solely in other fuels such as gasoline. It is also worth emphasizing that electric vehicles do not result in electricity savings; rather, they contribute to increased electricity usage. Consequently, Staff does not support the inclusion of the proposed Light Duty electric vehicle measure into the IL-TRM, as the associated "savings" cannot be counted toward an electric utility's savings goal or be considered toward demand response savings.

Another concern has been raised about the use of rebates for electric vehicles. As part of the beneficial electrification plans, it is stipulated that utilities are precluded from offering rebates for passenger electric vehicles, as this authority has been delegated to the IL EPA. This prompts consideration of whether Ameren plans to utilize Energy Efficiency (EE) funds for EV rebates, and the legality thereof. Due to this, Staff may not endorse the use of EE funds to incentivize the adoption of measures that would lead to an increase in electrical load, particularly in the case of electric vehicles.