

To: Don Brown, Clerk of the Illinois Pollution Control Board  
From: Scott Vogt, Vice-President, Strategy & Energy Policy, Commonwealth Edison Company  
("ComEd")  
Date: April 28, 2025  
Re: R2024-17 – In the Matter of: Proposed Clean Car and Truck Standards: Proposed Section  
35 Ill. Admin. Code 242

Mr. Brown –

My name is Scott Vogt, and I submit these comments on behalf of ComEd in support of Sierra Club, National Resources Defense Council Environmental Defense Fund, Respiratory Health Association, Chicago Environmental Justice Network, and Center for Neighborhood Technology's filed Proposed Clean Car and Truck Standards pursuant to Section 27 and 28 of the Environmental Protection Act ("Act"). 415 ILCS 5/27 and 28. ComEd urges the Board to adopt the Advanced Clean Cars II ("ACC II") regulation, the Advanced Clean Trucks ("ACT") regulation, and the Heavy-Duty Low NOx Omnibus ("Low NOx") regulation ("Proposed Rules").

ComEd is committed to working to achieve an affordable and clean energy future that promotes cleaner air and safer communities within our service territory. In 2023, ComEd filed its first Beneficial Electrification Plan ("BE Plan" or "Plan") as part of its implementation of the Climate and Equitable Jobs Act ("CEJA"). This Plan, and its successors, allow ComEd to reduce upfront costs of EVs and charging equipment; enable broad, equitable deployment of charging infrastructure and other electrification technologies; educate customers; and prioritize investments equitably for communities in need. ComEd's BE Plan can assist the State with its transition to the three Proposed Regulations. However, ComEd has identified five primary concerns of the opponents of these regulations, and we hope that through an explanation of our efforts we can alleviate this apprehension.

First, ComEd understands there are concerns regarding the lack of charging infrastructure in Illinois. We realize that achieving Illinois' and ComEd's clean energy goals, will require building out a system of accessible charging infrastructure. This is why ComEd is focused on targeting areas lacking public charging infrastructure to help more people consider an electric vehicle ("EV") as a viable option. In 2024, the first full year of ComEd's BE Plan, ComEd provided nearly \$18 million in incentives for both public and private charging infrastructure with a significant portion of that funding going to low income ("LI") and equity investment eligible communities ("EIEC").<sup>1</sup> This led to the installation of 3,377 charging ports. ComEd is on track

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<sup>1</sup> An equity investment eligible community ("EIEC") "means the geographic areas throughout Illinois which would most benefit from equitable investments by the State designed to combat discrimination and foster sustainable economic growth." 20 ILCS 627/45(b). EIECs include both Restore, Reinvest, Renew ("R3") communities and environmental justice ("EJ") communities. *Id.* R3 communities are those that "have been historically excluded

to provide millions more in charging installation incentives throughout the remainder of its initial BE Plan. In BE Plan 2, the Illinois Commerce Commission (“ICC”) recently approved a budget of \$11 million dollars in incentives for residential EV charging and \$46.8 million in incentives for public sector chargers and other public charging facilities. These incentives make charger installation more affordable for Illinois residents, businesses, and municipalities and, therefore, can be expected to accelerate the roll-out of EV charging infrastructure over the years leading up to vehicle model year 2029, when the Proposed Rules would become effective.

Second, ComEd understands the concerns regarding possible destabilization of the electric grid. ComEd is aware that to fully benefit from electrification, the electric grid must handle the extra load from newly electrified equipment. Significant impacts can occur at the local distribution level, especially with high voltage DC fast charging (DCFC) stations. Clustering EV charging stations or using them for large vehicles like buses can greatly increase power usage, potentially exceeding the capacity of local substations and other equipment. Therefore, the distribution system may need upgrades or modifications to manage higher peak loads and increased demands. ComEd’s short-term and long-term infrastructure investment planning process involves careful planning to respond to and anticipate the changing demands on the grid. Through its recently approved Multi-Year Integrated Grid Plan (“MGP”), ComEd will invest more than \$1.5 billion in investments and system improvements needed to strengthen power grid reliability and support the ongoing electrification of the State’s power system.

Additionally, as a condition of receiving a Residential EV Charger and Installation Program rebate, ComEd requires the rebate recipient to enroll in a time-variant rate option for a three-year period. These options are designed to provide a strong incentive for the program participant to charge its EV during off-peak hours, when grid utilization is more likely to be low. ComEd’s default rate structures for C&I customers provide an incentive for C&I and Public Sector EV Purchase Sub-program rebate recipients to charge in off-peak periods. Further, ComEd understands that ongoing cooperation and coordination between ComEd, vehicle owners, and charging providers continues to be essential to ensure a smooth integration of charging load, particularly for fleet applications where many high-demand vehicles may be charging at the same time.

Third, ComEd understands concerns regarding the affordability of EVs in comparison to internal combustion engine (“ICE”) vehicles. ComEd is keenly aware of the financial barriers to EV usage, particularly to LI/EIEC customers, therefore, several of ComEd’s BE Plan sub-programs directly

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from economic opportunities” as identified by 410 ILCS 705/10-40. 20 ILCS 627/45(b). EJ communities are communities that meet “the definition of that term based on existing methodologies and findings, used and as may be updated by the Illinois Power Agency and its program administrator in the Illinois Solar for All Program” as well as those “areas where residents have been historically subject to disproportionate burdens of pollution, including pollution from the energy sector, as established by environmental justice communities as defined by the Illinois Power Agency pursuant to Illinois Power Agency Act, excluding any racial or ethnic indicators.” *Id.* The EVA defines low-income (“LI”) as “persons and families whose income does not exceed 80% of the state median income for the current State fiscal year as established by the U.S. Department of Health and Human Services.” *Id.* The EVA uses, but does not define, the term low-income community (“LIC”). For purposes of ComEd’s BE Plan 2, ComEd is interpreting LIC to mean the communities represented in the [Illinois Solar for All Income Eligibility Map](#). These communities are made up of “census tracts where at least half of the households earn an income of 80% or less of the Area Median Income.” While this map uses *area* median income as opposed to *state* median income, absent a definition of LIC in the EVA, it is the best proxy that ComEd has been able to locate.

address these barriers. For example, the initial BE Plan dedicated \$114 million to offer financial incentives on electric fleet vehicles (including light-, medium-, and heavy-duty trucks), school buses, and transit buses—prioritizing investment in LI/EIEC communities. ComEd’s rebates make a meaningful difference in cost; for example, heavy-duty vehicles receive a per-vehicle rebate of \$50,000-\$75,000. In October 2024, ComEd announced that its fleet rebate program could also be used to purchase pre-owned electric vehicles, further expanding access.<sup>2</sup> In addition, the Plan provides rebates of up to \$3,750 for residential EV charging infrastructure, with an emphasis on low-income communities.<sup>3</sup> This program complements Illinois EPA’s \$4,000 EV rebate program, which also prioritizes low-income purchasers.<sup>4</sup> The second BE plan furthers ComEd’s commitment to affordable EVs for all: heavy-duty vehicles will continue to be eligible to receive rebates of up to \$75,000, and the second plan will provide rebates of up to \$2,500 for residential EV charging infrastructure.<sup>5</sup> By promoting the transition to clean energy, ComEd is helping to ensure consumers are more comfortable purchasing EVs; combined with the Proposed Rules, those efforts will help develop economies of scale that will further lower the costs of EVs.<sup>6</sup>

Fourth, ComEd understands that many consumers are hesitant to transition to EVs. ICE cars are familiar and have become culturally significant. Until people learn more about EV charging and test drive one, the technology may feel unfamiliar and different. Would-be adopters may be ill-informed or misinformed about the EV ownership experience and may not embrace EV adoption until they better understand the benefits of EV ownership. Increased education about EV ownership can help spur adoption. If more people better understand the similarities and differences between EV and ICE ownership, they may be more inclined to purchase an EV and unlock benefits, such as the expected lower total cost of ownership. Dispelling common misconceptions about EVs or relieving common concerns that potential drivers have is essential to maximize the effectiveness of a comprehensive electrification strategy.

ComEd’s BE Plan has invested millions in consumer education to alleviate consumers’ concerns. The BE Plan includes targeted outreach to LI/EIEC communities, as well as third-party fleet electrification feasibility assessments for commercial customers.<sup>7</sup> ComEd has also created a suite of websites and tools to help connect customers to information on electrification, including a fuel cost savings calculator<sup>8</sup> and a residential EV toolkit.<sup>9</sup> To further assist commercial and public sector customers, ComEd launched an EV load capacity map, which shows where developers can

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<sup>2</sup> Press Release, ComEd, ComEd Rebates Now Available for Pre-Owned Electric Fleet Vehicles (Oct. 29, 2024), <https://www.businesswire.com/news/home/20241029462522/en/ComEd-Rebates-Now-Available-for-Pre-Owned-Electric-Fleet-Vehicles>.

<sup>3</sup> ComEd, *supra* note 21, at 33.

<sup>4</sup> FAQ: Illinois’ Electric Vehicle Rebate Program, Illinois EPA (Jan. 2025), <https://epa.illinois.gov/content/dam/soi/en/web/epa/topics/ceja/documents/ev-rebate-program-faq.pdf>.

<sup>5</sup> Direct Testimony of Cristina Botero at 24, 27, Petition for Approval of Beneficial Electrification Plan, No. 24-0484 (Ill. Com. Comm’n, July 1, 2024), <https://www.icc.illinois.gov/docket/P2024-0484/documents/352350/files/616613.pdf>.

<sup>6</sup> ComEd, *supra* note 21, at 33; Statement of Reasons, *supra* note 1, at 41–44.

<sup>7</sup> *Id.* at 40–41.

<sup>8</sup> *Estimate your Fuel Cost Savings with an Electrified Fleet*, ComEd, <https://comed.chooseev.com/commercial/fleet-calculator/>.

<sup>9</sup> *Savings, Benefits & Incentives*, ComEd, <https://www.comed.com/smart-energy/innovation-technology/electric-vehicles/savings-benefits-incentives>.

install EV chargers most efficiently.<sup>10</sup> These investments in education are preparing Illinois residents for the new standards. The second plan continues ComEd's consumer education efforts, spending \$11 million to invest in expanding knowledge about electric vehicles and to further build out the EV load capacity map.

Fifth, and finally, ComEd understands the electric grid still relies on coal and natural gas which can diminish the lifecycle emissions advantage of EVs. ComEd is aggressively working to decarbonize the electric grid according to CEJA requirements. In 2024, ComEd customers had access to 96 percent clean power on an hourly basis – thanks to a large amount of nuclear generation in the region making our grid one of the cleanest in the nation – and Illinois plans to reach 100 percent.<sup>11</sup>

In sum, the Proposed Rules are both feasible and beneficial. ComEd is proactively planning and supporting increased electrification of on-road transportation and investing millions of dollars in building out charging infrastructure, strengthening the electric grid, incentivizing EV purchases, and educating consumers about EV benefits. We believe those investments will ensure the Proposed Rules can be implemented successfully.

Thank you for your consideration,

Scott Vogt

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<sup>10</sup> *EV Load Capacity Map*, ComEd, <https://exelonutilities.maps.arcgis.com/apps/webappviewer/index.html?id=8d4f22be2a3b47b0bb86ca5438a8dd69>.

<sup>11</sup> Press Release, ComEd, *ComEd Highlights 2024 Efforts to Advance the Clean Energy Transition in Northern Illinois* (Jan. 31, 2025), <https://www.businesswire.com/news/home/20250131632964/en/ComEd-Highlights-2024-Efforts-to-Advance-the-Clean-Energy-Transition-in-Northern-Illinois>.