

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	R 2024-017
PROPOSED CLEAN CAR AND)	
TRUCK STANDARDS)	(Rulemaking – Air)

NOTICE OF FILING

TO: Don Brown
 Clerk of the Board
 Illinois Pollution Control Board
 60 E. Van Buren St., Suite 630
 Chicago, IL 60605

Vanessa Horton
 Carlie Leoni
 Hearing Officers
 Illinois Pollution Control Board
 60 E. Van Buren St., Suite 630
 Chicago, Illinois 60605

(VIA ELECTRONIC MAIL)
 (SEE PERSONS ON ATTACHED SERVICE LIST)

NOTICE OF FILING

PLEASE TAKE NOTICE THAT on the 3d day of March 2025, the undersigned electronically filed with the Clerk of the Illinois Pollution Control Board, via the "COOL" system, Illinois Automobile Dealers Association's Response to Questions by Lawrence R. Doll and Mike Stieren on behalf of the Illinois Automobile Dealers Association, true and correct copies of which are attached hereto and hereby served upon you.

Respectfully submitted,
 ILLINOIS AUTOMOBILE
 DEALERS ASSOCIATION

By: /s/ Lawrence R. Doll

Dated: March 3, 2025

Lawrence R. Doll
 ILLINOIS AUTOMOBILE DEALERS ASSOCIATION
 300 W. Edwards, Suite 400
 Springfield, Illinois 62704
LDoll@illinoisdealers.com

PH: (217) 753-0220

CERTIFICATE OF SERVICE

I, the undersigned, on the oath, state the following: That I have served the attached

ENTRY OF APPEARANCE and RESPONSE TO QUESTIONS via electronic mail upon:

Mr. Don A. Brown Clerk of the Board Illinois Pollution Control Board 60 East Van Buren Street, Suite 630 Chicago, IL 60605 don.brown@illinois.gov	Vanessa Horton & Carlie Leoni Hearing Officers Illinois Pollution Control Board 60 East Van Buren Street, Suite 630 Chicago, IL 60605 vanessa.hotron@illinoi.gov carlie.leoni@illinois.gov
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That my email address is ldoll@illinoisdealers.com.

That the number of pages in the email transmission is 49.

That the email transmission took place on on March 3, 2025.

Date: March 3, 2025

/s/ Lawrence R. Doll

Lawrence R. Doll

CERTIFICATE OF SERVICE

I, Lawrence Doll, Legal Counsel for the Illinois Automobile Dealers Association, caused to be served on this 3d day of March 2025, a true and correct copy of the Illinois Automobile Dealers Association's Response to Questions upon the persons listed on the Service List via electronic mail or electronic filing, as indicated.

By: **/s/ Lawrence R. Doll**
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IN THE MATTER OF:)	
)	R 2024-017
PROPOSED CLEAN CAR AND)	
TRUCK STANDARDS)	(Rulemaking – Air)

RESPONSE TO QUESTIONS BY LAWRENCE R. DOLL AND MIKE STIEREN

Response to Questions from PCB

- 1. Question Directed to All Witnesses** 1. On February, 6, 2025, Commonwealth Edison (ComEd) announced \$100 million in new rebates designed to boost electric vehicle (EV) fleet purchases and charging stations across northern Illinois. The rebate program is discussed in a February 11, 2025 Canary Media article, titled “Illinois’ largest utility unveils \$100M to spur EV adoption”. The Board takes notice of this article, attached hereto as Attachment B, under Section 101.630 of the Board’s procedural rules. See 35 Ill. Adm. Code 101.630. As discussed in the Canary Media article, ComEd’s program helps meet the mandate for the State’s CEJA [Climate and Equitable Jobs Act], which calls for 1 million EVs on the roads by 2030. Of the \$100 million, \$53 million is available for business and public-sector EV fleet purchases, \$38 million is designed to upgrade infrastructure for non-residential charger installations, and nearly \$9 million is intended for residential charging stations. This money is in addition to \$87 million announced last year for similar incentives.

Participants have noted the shortfall of money and infrastructure needed to make 100% zero-emission vehicle (ZEV) sales by 2050 a reality. However, as the ComEd announcement purports, there are non-governmental entities that are already contributing toward the needed infrastructure and financing. Is it Participants’ position that market forces and other rebate and incentive programs would not contribute significantly to the ZEV mandate requirements of the proposed rule? If so, why?

Answer:

The Illinois Automobile Dealers Association (IADA) recognizes and appreciates the significant investments being made towards Illinois’ EV infrastructure, notably ComEd’s recent \$100 million initiative to support electric vehicle (EV) fleet purchases and charging stations. These private-sector contributions are vital for supporting the state’s Climate and Equitable Jobs Act (CEJA) objectives.

However, while these initiatives aid in accelerating EV adoption and are pivotal in our transition towards electric transportation, they remain insufficient to meet the extensive needs dictated by the Advanced Clean Cars II (ACC II) mandates. These mandates require substantial and

sustained investments far beyond current levels to address the comprehensive infrastructure and market readiness challenges ahead.

First, it should be noted that the article misrepresents Illinois' 1 million EV goal. CEJA included numerous provisions and mandates related to clean energy, electrification, and workforce development, but it did not legally mandate that Illinois achieve 1 million EVs by 2030. CEJA sets a goal of achieving 1 million EVs by 2030, which, while ambitious, is not a mandated target with enforcement penalties but rather an aspirational objective aiming to guide state policy and investment.

- *"Illinois should increase the adoption of electric vehicles in the State to 1,000,000 by 2030." (20 ILCS 627/45(a)(1))*

While this goal is ambitious, it does not carry the force of law. If the Illinois General Assembly had intended to create a binding mandate, it would have done so within CEJA itself. Instead, lawmakers left room for flexibility—recognizing that EV adoption depends on real-world infrastructure readiness, consumer demand, and economic feasibility.

Second, the question also references "100% zero-emission vehicle (ZEV) sales by 2050", but this is not accurate. ACC II mandates that all new light-duty vehicle sales be ZEVs by 2035—a full 15 years earlier than stated. This distinction is important. A 2035 deadline compresses the timeline for Illinois to develop the necessary infrastructure, transition consumer demand, and support dealerships through a massive industry shift.

To fully address the question, the following key considerations must be examined:

1. ACC II Ignores Regional Disparities in EV Adoption and Infrastructure

According to ComEd's recent press release (referenced in the February 11, 2025 Canary Media article), there are currently 126,000 EVs registered in Illinois, and over 112,000 (nearly 90%) are concentrated in Northern Illinois.

This means that only 14,000 EVs exist across the entire Ameren service territory (which covers Central and Southern Illinois).

Illinois Secretary of State EV registration data confirms this imbalance.

ComEd's program is helpful but only covers a small fraction of this need:

- \$53M is allocated to fleet vehicle purchases, which does not directly benefit consumers.
- \$38M is for non-residential charging upgrades, but this does not ensure widespread rural charging deployment or affordability for individuals.
- Only \$9M is dedicated to residential charging, which is not enough to enable widespread at-home charging adoption.

Simply put, private and utility-led investments alone do not and cannot bridge this infrastructure funding gap.

2. Private Investment Will Not Equally Distribute Charging Access Across Illinois

Market-driven infrastructure expansion tends to favor high-density, high-revenue locations, leaving rural and disadvantaged communities underserved.

According to the 'Driving a Cleaner Illinois' webpage and interactive map managed by the Illinois Environmental Protection Agency, charging infrastructure remains highly concentrated in select counties:

- **44 counties** in Illinois have **no state-funded EV chargers** (awarded or operational).
- **35 counties** have **awarded state-funded chargers**, but none are yet online.
- Only **23 counties** have at least one operational state-funded EV charger.

This means that **79 of Illinois' 102 counties (77%)** lack any operational state-funded EV charging infrastructure as of of March 1, 2025.¹

(<https://epa.illinois.gov/topics/air-quality/driving-a-cleaner-illinois.html>)

This lack of rural charging availability will limit consumer confidence in EV adoption outside major metro areas, stalling the ZEV transition for much of Illinois.

This uneven distribution raises concerns that ACC II's mandates will have disproportionate economic impacts across different regions of the state.

3. The Suspension of \$123 Million in Federal NEVI Funds Further Undermines Infrastructure Growth

A critical federal funding source for EV infrastructure—the National Electric Vehicle Infrastructure (NEVI) program—has been frozen as of February 2025.²

- Illinois had been allocated \$148.6 million in NEVI funds, but only \$25.3 million had actually been awarded for projects.
- Over \$123 million in planned EV infrastructure funding is now inaccessible, delaying or preventing crucial charging deployments across the state.

Without this funding, the state cannot move forward with federally funded charging projects, creating further uncertainty about whether Illinois will meet its charging needs in time for ACC II implementation.

4. Uncertainty Surrounding the California Waiver

¹ "Electric Vehicle Charging Station Supported/Funded by the State of Illinois." Accessed March 3, 2025. https://experience.arcgis.com/experience/1b71ab7f02cd424581ede5cdf28b37f6#data_s=id%3A42782518107b47f89eaa53978edceb5e-1932b579750-layer-2%3A13.

² "DOT Suspends EV Electric Vehicle Charging Network," Utility Dive, accessed March 3, 2025, <https://www.utilitydive.com/news/dot-suspends-ev-electric-vehicle-charging-network/739521/>.

On February 14, 2025, EPA Administrator Lee Zeldin announced that the current federal administration will send to Congress the California waivers granted by the prior (Biden) Administration, waivers that allowed California to set its own stricter vehicle standards rather than follow federal regulations.³

The **EPA asserts that the prior administration failed to submit these rules for congressional evaluation**, which it argues deprived legislators of the opportunity to assess their nationwide implications.

This review introduces **significant regulatory uncertainty**, as a reversal or modification of California's waiver authority could affect ACC II implementation and enforcement nationwide.

According to Administrator Zeldin, the Biden EPA failed to submit these rules to Congress for review, which the Trump EPA claims deprived legislators of the opportunity to evaluate major regulatory actions impacting the entire country.

Conclusion

While we acknowledge and support ComEd's investment and recognize it as an important contribution, its not enough to meet ACC II's aggressive mandates. Market forces alone will not close Illinois' infrastructure and funding gaps, and Illinois is already behind schedule compared to other states implementing ACC II.

For Illinois to successfully transition to 100% ZEV sales under ACC II, significant additional public investment and financial support for infrastructure expansion and consumer incentives will be required. Otherwise, the burden will fall disproportionately on consumers and businesses, creating major compliance and adoption challenges in the years ahead.

2. On page 1 of your joint testimony, you state, "Illinois dealers invested more than \$171,000,000 million in preparing for the sale and service of electric vehicles, underscoring our commitment to the EV transition."

a. Please clarify whether you meant the investment was \$171 million.

Answer: Yes, the correct figure is \$171 million

b. Please elaborate on how this amount was spent to advance EV transition.

Answer: The \$171 million investment by Illinois dealerships reflects substantial financial commitments made to support EV adoption and meet manufacturer requirements for selling and servicing electric vehicles.

³ U.S. Environmental Protection Agency, "Trump EPA to Transmit California Waivers to Congress in Accordance with Statutory Reporting Requirements," February 14, 2025, <https://www.epa.gov/newsreleases/trump-epa-transmit-california-waivers-congress-accordance-statutory-reporting>.

This investment has been distributed across several key areas:

- **Facility Upgrades & Charging Infrastructure** – Installation of EV charging stations at dealerships, including DC fast chargers and Level 2 chargers, to support both customer test drives and vehicle servicing needs.
- **Service Bay & Equipment Investments** – Upgrades to service departments, including specialized lifts, diagnostic tools, and battery-handling equipment required for servicing high-voltage EV batteries.
- **Technician Training & Certification** – Training dealership service technicians on EV repair, battery diagnostics, and high-voltage safety protocols. Manufacturers require extensive certification programs before a dealership can service EVs.
- **Inventory & Sales Training** – Investments in EV-specific sales training, consumer education initiatives, and dealership staff development to support informed purchasing decisions.
- **Software & Digital Tools** – Upgrades to dealership inventory management and diagnostic systems to handle EV-specific diagnostics, charging status tracking, and battery health monitoring.

These investments underscore Illinois dealerships' commitment to the EV transition, despite challenges related to consumer demand, infrastructure gaps, and cost burdens.

c. Please comment on whether this investment includes any government subsidies.

Answer: Yes, dealerships have been awarded state funding for EV charging projects. While the majority of the \$171 million investment was funded directly by dealerships, some dealers have received state grants to install public-facing EV chargers at their locations. These awards come from state-administered EV infrastructure programs, including grants funded through CEJA (Climate and Equitable Jobs Act) and Volkswagen settlement funds.

An appendix with a list of dealerships that have received state funding for EV charging projects is attached based on available information from state sources.

3. On page 8 of your joint testimony, you state that to meet the proponents' target for the MY 2029 ZEV sales requirement of 59%, Illinois would need to sell 321,625 zero emission vehicles in 2028. Please comment on whether the MY 2029 sales target is consistent with the CEJA target of 1 million electric vehicles on Illinois roads by 2030.

Answer: The MY29 ZEV sales target mandated by Advanced Clean Cars II (ACC II) differs significantly from the aspirational goal outlined by Illinois' Climate and Equitable Jobs Act

Specifically:

1. **CEJA's Goal is Aspirational:** CEJA outlines a goal of reaching one million electric vehicles in Illinois by 2030, but it sets no binding regulatory mandate. Rather, CEJA establishes a recommended target, reflecting a policy goal rather than a requirement with enforceable penalties.

2. **ACC II Represents a Binding Regulatory Mandate:** In contrast, ACC II sets a strict regulatory quota, mandating that 59% of new passenger vehicle sales in MY 2029 must be zero-emission vehicles. This requirement imposes compliance obligations directly on auto manufacturers and includes potential penalties for noncompliance. Importantly, ACC II specifically addresses only new vehicle sales and does not account for used EV sales, fleet turnover, or broader consumer adoption patterns.
3. **Practical Implications for Illinois' EV Market:** To meet ACC II's mandated 59% ZEV sales requirement for MY 2029, Illinois would need to achieve approximately 321,625 new ZEV sales in 2028—a significant increase from current annual EV sales trends. Achieving this level of adoption within a few years presents substantial challenges, particularly given existing barriers such as affordability, charging infrastructure limitations, and consumer adoption trends.

In summary, the MY 2029 ZEV sales mandate under ACC II and CEJA's 2030 aspirational EV target serve fundamentally different purposes and impose different obligations. Meeting ACC II's regulatory requirements will be challenging given Illinois' current market dynamics and infrastructure, highlighting the gap between policy aspirations and market realities.

Response to Questions from the Illinois Environmental Protection Agency

1. To your knowledge, do any Illinois dealerships currently participate in a dealer financial assistance program? If so, how many? If so, will the financial assistance program assist the automobile manufacturers' compliance obligations under the proposed rule? If not, what type of investment would be needed to incentivize dealerships to participate in a dealer financial assistance program?

Answer:

- ***To the question, "To your knowledge, do any Illinois dealerships currently participate in a dealer financial assistance program?"***

No, the IADA is unaware of any dealerships participating in any dealer financial assistance program that would qualify under the Advanced Clean Cars II (ACC II) framework for Environmental Justice (EJ) credits. Unlike California, which has implemented the Clean Cars for All (CC4A) program, Illinois does not have a state-administered initiative that provides direct financial assistance to dealerships for selling ZEVs to low-income consumers.

The Illinois EV Rebate Program, funded through the Climate and Equitable Jobs Act (CEJA), provides up to \$4,000 for EV purchases and \$1,500 for electric motorcycles, but these rebates are exclusively consumer-focused. There is no dedicated financial mechanism that supports dealership participation, meaning automakers cannot utilize this compliance pathway to generate EJ credits under the proposed rule.

The absence of a dealer financial assistance program in Illinois creates an uneven regulatory landscape, making compliance with ACC II more stringent in Illinois than in California. In California, automakers can leverage CC4A-participating dealerships to generate EJ credits, providing an essential compliance flexibility. Without a comparable program, Illinois dealerships—most of which are small businesses—face significant financial and operational challenges in meeting the state's proposed mandates.

- ***To the question, "If not, what type of investment would be needed to incentivize dealerships to participate in a dealer financial assistance program?"***

To establish a dealer financial assistance program that aligns with ACC II compliance mechanisms, Illinois would need to develop and fund a program similar to California's Clean Cars for All (CC4A). California has allocated \$436 million to this initiative, offering up to \$12,000 in rebates for low-income consumers purchasing a ZEV, with dealerships playing a direct role in the program.

For Illinois to create a similar program, it would require a significant financial investment focused on:

- **Expanding Consumer Rebates for ZEV Purchases:** Adjusting Illinois' current EV Rebate Program to provide higher incentives for low-income buyers, while structuring rebates to be processed through participating dealerships rather than awarded post-purchase.

- Dealer Participation Incentives: Providing grants, tax breaks, or direct financial assistance to dealerships that actively sell ZEVs to low-income consumers, ensuring that automakers can generate EJ credits for compliance.
- Program Administration & Outreach: Establishing a state-managed framework that allows dealerships to enroll in a financial assistance program, similar to how California integrates its dealerships into CC4A.

This lack of dealership support is not just a regulatory challenge—it's an economic burden. The Illinois Administrative Procedure Act emphasizes the need to minimize economic burdens on small businesses, yet without financial assistance, many small, family-owned dealerships may struggle to remain competitive. Unlike large corporate retailers, these dealerships lack the resources to absorb the costs of transitioning to a ZEV-focused market, making it more difficult for them to comply with ACC II mandates without external support.

Without a dedicated financial assistance program, Illinois dealerships will remain unable to participate, leaving automakers without a key compliance tool and creating a regulatory disadvantage compared to California and other ACC II states with robust funding mechanisms.

Given Illinois's existing infrastructure funding shortfall to meet ACC II's charging requirements, creating additional financial barriers for automakers and dealerships only exacerbates the challenge of compliance. Small businesses—such as local dealerships—should not bear the financial weight of an unfunded mandate.

To level the playing field, Illinois must either establish a dedicated dealer financial assistance program or explore alternative compliance pathways that recognize the absence of such an initiative in the state. Without action, Illinois risks disproportionately harming small businesses, reducing consumer vehicle choice, and disrupting the local automotive market in ways that could have long-term economic consequences.

2. For Illinois automobile dealerships, what is the current lowest MSRP of a model year 2025 ZEV and a model year 2025 light-duty truck ZEV in Illinois?

Answer:

The IADA unfortunately does not have direct access to manufacturer-specified MSRP data for all dealerships statewide, as manufacturers, not dealers, set MSRP.

However, to provide an accurate response, IADA conducted research using reputable automotive pricing and review sources to determine the lowest available Model Year 2025 (MY 2025) Zero Emission Vehicles (ZEVs) and light-duty ZEV trucks currently on the market in Illinois.

Lowest MSRP for a 2025 ZEV Passenger Car: According to MotorTrend and Car and Driver, the lowest MY 2025 Zero Emission Vehicle (ZEV) passenger car available on the market is the 2025 Nissan Leaf, at \$29,280 MSRP.

- EPA Range: 149–214 miles

- Peak Charging Speed: 50 kW

According to those sites, the remaining MY 2025 ZEVs under \$40,000 include:

- 2025 Mini Cooper Electric – \$33,050 (estimated)
- 2025 Hyundai Kona Electric – \$34,270
- 2025 Fiat 500e – \$34,345 (estimated)
- 2025 Chevrolet Equinox EV – \$34,995
- 2025 Volvo EX30 – \$36,145

Lowest MSRP for a 2025 Light-Duty Truck ZEV: Based on Car and Driver, Edmunds, and Business Insider, the lowest MY 2025 light-duty truck ZEV available in Illinois is the 2025 Ford F-150 Lightning Pro at \$47,780 MSRP.

- EPA Range: 240 miles
- Peak Charging Speed: 150 kW

Additional MY 2025 Light-Duty Electric Pickup Trucks available in Illinois include

Model	MSRP Range (2025)
Ford F-150 Lightning	\$47,780–\$84,995
Rivian R1T	\$69,900–\$99,900
Tesla Cybertruck	\$81,895–\$101,985
Chevrolet Silverado EV	\$75,195–\$100,495 (retail)
GMC Sierra EV	\$91,995–\$100,495
Ram 1500 REV	\$58,000–\$100,000 (approx.)

It is important to note that while the Ford F-150 Lightning remains the most affordable electric truck currently available, its starting MSRP of \$47,780 is nearly **\$20,000 higher** than the lowest-priced gasoline-powered light-duty trucks, such as the 2025 Ford Maverick, which has a starting MSRP of \$27,890.

Key Citations:

1. Car and Driver. *Ford F-150 Lightning Review, Pricing, and Specs*. Accessed March 2025. <https://www.caranddriver.com/ford/f-150-lightning>.
2. Edmunds. *Rivian R1T Prices, Reviews, and Pictures*. Accessed March 2025. <https://www.edmunds.com/rivian/r1t>.
3. Car and Driver. *Tesla Cybertruck Review, Pricing, and Specs*. Accessed March 2025. <https://www.caranddriver.com/tesla/cybertruck>.
4. Chevrolet. *Electric Silverado EV Overview*. Accessed March 2025. <https://www.chevrolet.com/electric/silverado-ev>.
5. GMC. *Electric Sierra EV Overview*. Accessed March 2025. <https://www.gmc.com/electric/sierra-ev>.
6. Car and Driver. *Ram 1500 REV: What We Know So Far*. Accessed March 2025. <https://www.caranddriver.com/ram/1500-rev>.

7. Business Insider. *Electric Pickup Trucks Reshape U.S. Auto Industry with Luxury and Performance*. Accessed March 2025, <https://www.businessinsider.com/electric-pickup-trucks-reshape-us-auto-industry>.
3. To your knowledge, as to Illinois automobile dealerships that have electric vehicle chargers available for public use, do the dealerships charge drivers? If so, what is the current average rate per kilowatt hour?

Answer:

IADA has contacted several dealerships with customer-facing electric vehicle (EV) chargers to gather information on pricing. At this time, we have confirmed pricing at one dealership, Green Hyundai in Springfield, Illinois, and are awaiting responses from additional stores. We will provide the EPA with updated findings as soon as we receive more data from other dealerships.

At Green Hyundai, the dealership operates two DC fast chargers that are available for public use and charges drivers for their use. **The current rate is \$0.25 per kilowatt-hour (kWh)**, a price set by the dealership based on a review of comparable charging stations within a 90-mile radius, where pricing typically ranges between \$0.35 to \$0.55 per kWh.

In terms of usage data, Green Hyundai's DC fast chargers recorded the following electricity consumption over the past three months:

- February 2025: 4.06 megawatt-hours (MWh)
- January 2025: 3.71 MWh
- December 2024: 3.9 MWh

Additionally, in February 2025, the dealership reported:

- 172 total charging sessions
- An average session duration of 1 hour and 17 minutes

As more dealerships respond, IADA will supplement this information with additional pricing and usage data to provide a broader perspective on EV charging costs at Illinois automobile dealerships.

Response to Questions from the Rule Proponents

1. Please explain each of your professional qualifications as they pertain to your testimony and the subject matter of the Proposed Rules.

Answer-Mike Stieren

My background and professional experience uniquely qualify me to provide testimony on the Proposed Rules and their implications for Illinois. I possess extensive expertise in energy policy, environmental regulation, and public utility oversight, with a strong foundation in legislative analysis, regulatory policy development, and electricity market economics. My experience spans both legislative policy formulation and regulatory implementation, giving me a comprehensive perspective on the intersection of transportation policy, energy regulation, and economic impacts—key considerations in this rulemaking.

From 2014 to 2022, I served on the Illinois House Republican Research Staff, assigned to the Energy & Environment Committee and the Public Utilities Committee. In this role, I was responsible for analyzing hundreds of legislative proposals related to Illinois energy and environmental policy, directly influencing legislative discussions and advising lawmakers on key policy decisions.

My work included:

- Future Energy Jobs Act (FEJA) Implementation – Following the passage of FEJA (2016), I participated in working groups and policy discussions that influenced its implementation and regulatory framework.
- Climate and Equitable Jobs Act (CEJA) Development – During the drafting of CEJA (2021), I was actively involved in:
 - The Governor's 2020 Energy Working Groups
 - The Illinois Senate-led Energy Working Groups (2021)
 - Analyzing legislative proposals, tracking policy negotiations, and providing briefings and technical analyses for the House Republican Caucus.
- Regulatory, Financial, and Environmental Impact Analysis – I evaluated how major state energy policies would affect Illinois' utility markets, ratepayers, and renewable energy development, ensuring data-driven policy recommendations.

My legislative experience provided me with direct exposure to Illinois' energy policy framework, including renewable energy mandates, emissions regulations, and utility rate structures—all of which are relevant to assessing the feasibility of ACC II.

From 2022 to 2023, I worked at the Illinois Commerce Commission (ICC) as a Policy Analyst III, focusing on renewable energy, electricity procurement, and public utility regulation. My role included:

- Advising on Illinois' Adjustable Block Program and Illinois Solar for All Program, expanded under CEJA.
- Serving as the ICC appointee to the Illinois Solar for All Advisory Committee, providing expertise to increase program participation.
- Conducting energy storage analysis and reviewing policy recommendations for Illinois' Long-Term Renewable Resources Procurement Plan.

With this background, I am well-equipped to assess the feasibility and economic implications of ACC II.

Answer-Lawrence R. Doll

I have served as General Counsel for the Illinois Automobile Dealers Association since 2007. During that time, I have advised the Association and its membership on a variety of legal issues impacting the motor vehicle retail industry. Prominent issues during my time at IADA include matters of environmental policy, such as the impact of Corporate Average Fuel Economy standards and fuel efficiency incentives such as the federal Cash for Clunkers program, the federal Electric Vehicle Income Tax Credit, and the Illinois Environmental Protection Agency's Electric Vehicle Rebate Program have occupied much of my time.

Prior to working at IADA, I was the director of Legislative Affairs for the Illinois Department of Revenue. Among the legislation that I analyzed and advocated for or against were a host of bills dealing with taxation of motor fuel and various energy supplies.

With this background, I am equipped to assess the feasibility and economic impact of ACC II.

2. Is it correct to state that your testimony is wholly related to the Advanced Clean Cars II rule ("ACC II"), and does not relate to the Advanced Clean Trucks and Low NOx Omnibus rules that are also part of the Proposed Rules?

Answer: Yes, our testimony is wholly focused on the Advanced Clean Cars II (ACC II) rule, as it directly impacts the Illinois auto dealer industry, consumer choice, and the state's transportation economy. Our analysis and concerns were specific to the mandated transition to ZEVs for passenger vehicles and the associated economic, infrastructure, and equity implications.

That said, while our testimony did not explicitly address the Advanced Clean Trucks (ACT) rule or the Low NOx Omnibus rule, we share concerns about the broader impacts of these regulations on Illinois businesses, consumers, and transportation infrastructure. We recognize that the trucking industry is best positioned to speak to the operational and logistical challenges of ACT, and we expect their testimony to highlight those issues in depth.

However, if ACC II, ACT, and the Low NOx rule are being considered as a package, we have significant concerns about the cumulative burden these rules would place on Illinois' economy, workforce, and transportation funding. If the Board is considering them together, then our opposition would extend to the entire package of proposed rules.

3. On page 5 of your testimony, you state, “[b]etween 2022 and 2024, Illinois dealers invested more than \$171,000,000 million in preparing for the sale and service of electric vehicles, underscoring our commitment to the EV transition.”

- a. Please confirm that the dollar figure for investments on the part of Illinois auto dealers you intended to cite is \$171 million, equivalent to \$171,000,000.

Answer: Yes, the correct figure is \$171 million.

- b. Please provide any data or other materials used or referenced in the calculation of that figure.

Answer: This figure is based on internal data/surveys from Illinois auto dealers reflecting investments in charging infrastructure, technician training, specialized tools, and facility upgrades necessary to support EV sales and service between 2022 and 2024.

- c. Please explain what actions or investments that Illinois dealers are taking to prepare for the sale and service of electric vehicles.

Answer: Illinois dealers have made substantial financial commitments to prepare for the transition to EVs, including:

- Facility Upgrades – Installation of EV charging stations, service bays designed for high-voltage battery maintenance, and building modifications to accommodate EV servicing.
- Technician Training – Specialized certification programs to train auto mechanics in EV diagnostics, repairs, and battery handling.
- Inventory & Equipment Investments – Purchasing diagnostic tools, specialized lifts, and high-voltage safety equipment required for EV servicing.
- Consumer Education – Providing test drives, informational sessions, and customer support to assist buyers in understanding EV technology.

- d. On page 6 of your testimony, you state that the Proposed Rules impose a “rigid, one-size-fits-all framework.” Can you explain whether you have considered that the proposed ACC II includes multiple compliance flexibilities, such as various different types of compliance credits? Please explain what analysis you have performed or reviewed of those compliance flexibilities and indicate where such analysis appears in your testimony.

Answer: While proponents point to compliance flexibilities within ACC II, these mechanisms do not change the fact that this is a rigid, one-size-fits-all framework that forces Illinois to conform to California’s regulations without accounting for the state’s unique economic, geographic, and infrastructure challenges. ACC II mandates an identical ZEV transition timeline for every adopting state, regardless of differences in consumer demand, charging infrastructure, climate conditions, or workforce readiness.

The rule does not allow Illinois to tailor its approach based on regional factors, rural versus urban disparities, or market readiness—it simply imposes California’s policies wholesale. Compliance credits do not alleviate the fundamental issue that Illinois would be required to phase out new ICE vehicle sales on the same schedule as California, despite stark differences in EV infrastructure development, energy grid composition, and population distribution.

Our testimony focuses on the real-world consequences of ACC II—inventory overstock, limited consumer choice, and financial burdens on dealers and consumers alike—not on regulatory credit trading, which does nothing to address these larger concerns.

4. On page 6 of your testimony, you state: “Despite the growing number of EVs being sold, a clear mismatch between inventory and demand persists. According to S&P, as of September 2024, total U.S. vehicle inventory reached 3.056 million units, a 4.7% increase from the previous month and the highest level since the Covid pandemic. However, EV inventory declined by 2.6% compared to August 2024, reflecting adjustments by manufacturers to address oversupply. Meanwhile, EVs remained on dealer lots for an average of 103 days—substantially longer than the 74 days for gasoline vehicles—underscoring a slower pace of consumer adoption and widening the gap between production and demand.”
 - a. Are there factors other than the number of vehicles from manufacturers that contribute to the time those vehicles spend in a dealer’s inventory?

Answer: Yes, several factors influence inventory turnover, but the primary driver of extended EV inventory times is weak consumer demand. EVs are sitting on lots longer than gasoline vehicles despite significant government incentives, aggressive marketing, and manufacturer price cuts. The slower pace of adoption is not an inventory management issue—it’s a market demand issue.

Other contributing factors include:

- Higher Price Points – Even with federal and state incentives, EVs remain significantly more expensive than their gasoline counterparts.
- Range and Infrastructure Concerns – Consumers remain hesitant due to charging limitations, particularly in rural and suburban areas.
- Resale Uncertainty – The rapid pace of EV technology advancement leads to concerns about depreciation and battery longevity, discouraging purchases.

Dealers are not holding onto EVs by choice—these vehicles are not selling fast enough due to high costs, infrastructure gaps, and consumer hesitation. Until demand increases, EV inventory turnover will remain slow, regardless of manufacturer production levels.

- b. For any type of vehicle, are there steps manufacturers or dealers can take to move inventory off of dealer lots more quickly?

Answer: Yes, but those steps are already being taken, and they aren’t solving the core issue.

Dealers and manufacturers have aggressively cut prices, increased incentives, and expanded leasing options to try to move EV inventory. Yet, despite these efforts:

- Ford and GM have cut back EV production targets due to slower-than-expected demand.
- Toyota has reduced its EV production outlook and doubled down on hybrids instead.
- Tesla, once the industry leader, has seen its first annual sales decline in over a decade.

Manufacturers and dealers have exhausted traditional inventory management strategies. The problem is not a lack of action—it's that the market is not responding in the way ACC II proponents claim it will.

- c. Are all of the figures you rely on in the above-quoted assertions based on the national EV market and not the Illinois market?

Answer: While the S&P Global data referenced reflects national EV market trends, Illinois-specific data from the Secretary of State's office and utility reports show similar slowing adoption patterns. Illinois-specific data from the Secretary of State's office confirms that EV registrations grew at a slower pace in 2024 than in 2023, indicating a cooling market despite continued incentive programs.

Further, Illinois' EV adoption rate remains well below what ACC II mandates will require. Meeting the ACC II Model Year 2029 ZEV sales requirement of 59% would require exponential growth far beyond current trends. Illinois' market does not appear to support such a rapid shift, and there is no evidence to suggest it will.

If the Proponents have data on the Illinois EV consumer demand that shows consumer demand will be able to support the mandates proposed in the Rule, then they should provide it.

- d. Is the only basis for your opinion that there is a "slower pace of consumer adoption" of EVs your assertion that EVs remain on dealer lots for longer than gasoline vehicles?

Answer: No.

While inventory turnover is a clear and quantifiable indicator, additional data supports the conclusion that EV adoption is lagging behind expectations:

- SOS EV registration data.
- Pew Research Center data shows that consumer interest in EVs has declined, with only 29% of Americans indicating they are somewhat or very likely to consider an EV—down from 38% the previous year.
- Automakers have walked back EV production targets, citing softening demand, high costs, and slowing adoption rates.
- EV market share in the U.S. has not kept pace with expectations, leading to overproduction and inventory buildups despite deep price cuts.

Consumer hesitation is driven by legitimate concerns about cost, infrastructure, range limitations, and long-term reliability. ACC II is predicated on the assumption that EV adoption will accelerate exponentially—but all real-world data suggests otherwise.

If proponents believe that Illinois consumers will suddenly demand EVs at a level sufficient to meet ACC II's 59% sales requirement by Model Year 2029, they should provide clear, Illinois-specific evidence to support that claim. So far, that evidence does not exist. Meanwhile, the data available today tells a different story: EV adoption is slowing, manufacturers are scaling back production, and consumer confidence is not where ACC II assumes it will be.

5. Do you agree that if manufacturers are required to meet sales targets for EVs, they could take that into account in their production planning during the multiple years between Board promulgation of the Proposed Rules and the first model year to which the ACC II requirements would apply in Illinois?

Answer: Yes, manufacturers can adjust their production planning in response to regulatory mandates, and they will account for ACC II when setting future targets. However, planning for a mandate does not create consumer demand, expand charging infrastructure, or address affordability concerns.

The issue is not whether automakers have enough time to prepare—it is that no amount of planning can force consumers to buy EVs at the rate ACC II requires. Automakers have already spent years ramping up EV production, yet real-world demand has not aligned with expectations. Ford, GM, and Toyota have all reduced their EV production targets due to slower-than-expected sales, despite aggressive marketing, government incentives, and years of preparation. Tesla, the dominant EV manufacturer, has reported its first annual sales decline in over a decade, reinforcing the reality that demand is not meeting projected targets.

Manufacturers cannot plan their way around market realities. If Illinois consumers are not purchasing EVs at the scale ACC II mandates, automakers will be left with two choices:

1. Reduce allocations of ICE vehicles to Illinois, effectively forcing consumers into an EV market they may not be ready for.
2. Absorb financial penalties for noncompliance, which could increase vehicle prices for all consumers.

Either scenario would distort the market, reduce consumer choice, and place financial strain on Illinois dealerships and buyers. ACC II assumes that manufacturers can prepare their way into compliance, but no amount of production planning will overcome affordability concerns, infrastructure shortages, or consumer hesitancy. Illinois must consider whether a rigid mandate is viable when even the largest automakers are adjusting their EV strategies in response to weaker-than-expected demand.

6. How does your testimony address the negative environmental and human health impacts of vehicle emissions?

Answer: Our testimony fully acknowledges the importance of reducing vehicle emissions and improving environmental and public health outcomes. However, reducing emissions must be done in a way that is practical, effective, and sustainable—not through rigid mandates that fail to account for market realities, infrastructure limitations, and economic consequences.

The Rule Proponents seem to believe that an aggressive ZEV mandate is the only way to achieve emissions reductions, but that is simply not true. Our testimony highlights alternative pathways—including the role of hybrids, ongoing advancements in internal combustion engine (ICE) efficiency, and policies that align with Illinois' energy landscape. Studies from MIT and *Emissions Analytics* show that hybrids can reduce CO₂ emissions up to 14 times more effectively than BEVs per vehicle, especially when factoring in battery production impacts, resource constraints, and electricity grid reliance.

Moreover, ACC II fails to consider the social and economic costs of forcing a rapid transition to ZEVs. The rule disproportionately impacts low-income and rural communities, where charging infrastructure is lacking and ICE vehicles remain a necessity. A policy that prioritizes emissions reductions while ignoring affordability and infrastructure gaps creates its own form of environmental injustice, forcing hardship on communities least equipped to bear the burden. If the goal is to meaningfully reduce emissions while protecting public health, Illinois needs a flexible, regionally tailored approach—not a one-size-fits-all mandate copied from California. Our testimony raises real-world concerns about how this rule will affect Illinoisans, and those concerns should not be dismissed simply because they challenge the proponents' preferred policy approach.

7. You state, on page 7 of your testimony, that “[national consumer] skepticism [about EVs] stems from concerns about cost, infrastructure, and reliability, with just 30% confident in the nation's ability to build adequate charging infrastructure.”
 - a. Please provide any sources upon which you relied to conclude that this national skepticism is, in fact, also reflected in the viewpoints of Illinois consumers.

Answer: Illinois consumers are not exempt from the national skepticism toward EV adoption. The same market conditions, cost concerns, and infrastructure limitations that exist nationwide apply to Illinois as well. Illinois-specific data from the Secretary of State's office confirms that EV adoption in the state is not accelerating at the rate needed to meet ACC II's mandates—a direct reflection of consumer hesitation.

Additionally, the Pew Research Center studies cited in our testimony provide data on broad national trends in EV adoption and consumer sentiment, which are applicable to Illinois unless proponents can provide data to the contrary.

- b. What is the basis for your assertion that the Pew study results you summarize “stem[] from concerns about cost, infrastructure, and reliability”?

Answer: My assertion that concerns about cost, infrastructure, and reliability are the primary factors behind declining EV interest is directly supported by multiple Pew Research Center

studies conducted in June 2023, July 2023, and June 2024. These studies, which track evolving public sentiment on EV adoption, explicitly identify these three factors as the biggest barriers to widespread adoption.

The three Pew Research Center studies—conducted in June 2023, July 2023, and June 2024—explore American attitudes toward energy, climate change, and electric vehicles. Together, they reveal a growing skepticism and declining interest in EVs despite broad support for renewable energy and climate action.

For these studies, Pew used the American Trends Panel (ATP), a nationally representative group of U.S. adults, ensuring consistent data collection across all three surveys. The June 2023 study sets a broad context, exploring energy and climate attitudes with some EV insights.

The July 2023 study narrows in on EVs, likely building on the June findings to investigate adoption barriers in detail.

The June 2024 study acts as a follow-up, tracking changes in EV attitudes over time, showing a decline in interest and confidence.

Together, they track evolving public opinion, revealing how support for climate goals doesn't fully translate to EV enthusiasm, with practical and perceptual challenges becoming more prominent.

Pew Research Center Study Summaries

- June 2023 Study – *Majorities of Americans Prioritize Renewable Energy, Back Steps to Address Climate Change*
 - Shows strong support for renewable energy (67%) and carbon neutrality (69%), but reveals that only 38% of Americans would consider an EV.
 - 59% oppose phasing out gas vehicles by 2035, demonstrating resistance to mandates like ACC II.
- July 2023 Study – *How Americans View Electric Vehicles*
 - 38% of Americans say they would consider an EV, but major barriers remain:
 - 48% cite high cost as a deterrent.
 - 35% prefer gasoline vehicles over EVs.
 - 30% worry about charging availability and 29% about driving range.
- June 2024 Study – *About 3 in 10 Americans Would Seriously Consider Buying an Electric Vehicle*
 - EV consideration dropped to 29% from 38% in 2023, indicating declining consumer interest.
 - 72% believe EVs have higher upfront costs than gas vehicles.
 - 50% see EVs as less reliable, up from 34% in 2021.
 - Only 30% are confident in the nation's ability to build adequate charging infrastructure.
 - 47% believe EVs are better for the environment, down from 67% in 2021.

Key Takeaways from the Studies

- EV enthusiasm is declining despite continued incentives and policy support.
- Affordability, infrastructure, and reliability remain the biggest consumer concerns.
- Confidence in EV charging infrastructure is low, making widespread adoption even more difficult.
- Consumer preference for gas-powered vehicles persists, challenging the feasibility of mandates like ACC II.

- c. Assuming all other factors remain constant, does the price of a vehicle generally go down when the supply of that vehicle goes up?

Answer: This question oversimplifies basic market dynamics by assuming that supply alone dictates price. In reality, demand is just as important—if not more so. While an increase in supply can lead to price reductions in a balanced market, prices do not necessarily fall if demand does not keep pace. Instead, excessive supply creates inventory backlogs, leading manufacturers and dealers to cut production rather than continue producing vehicles that are not selling.

This is exactly what we are seeing in today's EV market. Automakers have ramped up EV production, but consumer demand has not followed at the same rate. As a result, manufacturers are now dealing with excess inventory, leading to price cuts and production slowdowns.

- Ford, GM, and Toyota have all reduced their EV production targets because demand has not met expectations, despite years of planning, incentives, and aggressive marketing.
- Tesla, despite multiple price cuts in 2023 and 2024, saw its first annual sales decline in over a decade—demonstrating that lowering prices does not necessarily translate into higher consumer adoption.
- Hybrid sales surged 36.7% in 2024, while fully electric vehicle sales have not grown at the same pace, proving that consumers are still hesitant to transition to EVs even when prices drop.⁴

While increasing supply can put downward pressure on prices, that only works if consumer demand follows. In the current EV market, price cuts have not been enough to drive adoption at the pace ACC II assumes. Instead of creating a healthy supply-and-demand balance, excessive EV inventory has forced automakers to scale back production, proving that ACC II's market expectations do not align with real-world consumer behavior.

- d. Regarding charging infrastructure, do you dispute that Illinois has several other government programs that specifically address EV charging infrastructure, including 14 truck charging hubs and 1,476 stations statewide, as part of a broader effort to promote cleaner transportation through Illinois charging infrastructure?

⁴ "Consumers Boosted 2024 US New Car Sales to Five-Year High," Reuters, January 3, 2025, <https://www.reuters.com/business/autos-transportation/consumers-boosted-2024-us-new-car-sales-five-year-high-2025-01-03/>.

Answer:

No, we do not dispute that Illinois has EV infrastructure programs, including Driving a Cleaner Illinois and other initiatives under the Climate and Equitable Jobs Act (CEJA). However, the existence of these programs does not mean infrastructure is currently sufficient to support ACC II's mandated transition timeline.

Statewide data from Illinois' EV infrastructure programs reveals that:

- 44 counties = No state-funded chargers at all (awarded or online).
- 35 counties = State-funded chargers awarded, but none are online yet.
- Only 23 counties have at least one operational state-funded charger.

That means 79 of 102 counties (77%) have no operational state-funded EV chargers as of now⁵.

- e. Are you aware that Governor JB Pritzker recently announced that Illinois secured \$114 million in federal funding to expand electric vehicle charging infrastructure, including 14 truck charging hubs and 1,476 stations statewide, as part of a broader effort to promote cleaner transportation through Illinois charging infrastructure

Answer: Yes, we are aware of this funding. However, \$114 million, while a positive step, represents a fraction of the long-term infrastructure investment needed to support a mandated transition to ZEVs.

Given the magnitude of this rule, it should also be noted that the current federal administration froze the National Electric Vehicle Infrastructure (NEVI) program in February 2025, blocking over \$100 million earmarked for Illinois. This pause, part of a broader review, halts new NEVI projects until updated guidance is released—likely delaying Illinois' broader infrastructure goals. Though the \$114 million is separate, the NEVI freeze undermines the state's ability to build a comprehensive charging network, making the path to ACC II even rockier.

The \$114 million is a positive move, but it's not enough to declare Illinois ready for an EV mandate as the Rule Proponents call for.

8. On page 7 of your testimony, you state that "EV adoption is slowing [in Illinois]." To substantiate that claim, you cite only to Secretary of State data related to total EV registrations, and not registrations of new vehicles, correct?

⁵ Electric Vehicle Charging Station Supported/Funded by the State of Illinois." Accessed March 3, 2025. https://experience.arcgis.com/experience/1b71ab7f02cd424581ede5cdf28b37f6#data_s=id%3A42782518107b47f89eaa53978edceb5e-1932b579750-layer-2%3A13.

Answer: The assertion that EV adoption is slowing in Illinois is based on real-world data from the Illinois Secretary of State's office, which tracks the total number of EVs registered in the state. This data clearly shows that the rate of EV adoption has declined year-over-year, contradicting the assumption that demand is accelerating at the pace needed to meet ACC II's mandates.

While proponents may argue that new vehicle registrations are a more relevant metric, total EV registrations still provide a meaningful indicator of adoption trends, especially when analyzed over time. The data shows that growth in EV registrations slowed from 2023 to 2024, even with ongoing state and federal incentives.

Key Data Points from the Illinois Secretary of State and DOE:

- New EV sales adoption rate in Illinois (2024): 7.31% (*DOE*).
- Total EV registrations in Illinois:
 - 2023: 91,451 → 2024: 122,775 (*Illinois SOS*).
- EVs account for only 1.46% of Illinois' total registered fleet, which is far below the trajectory required under ACC II.
- Growth in EV registrations slowed, with an increase of 31,459 in 2023 compared to 31,324 in 2024, despite continued incentives.

This data reinforces that Illinois is experiencing the same EV adoption slowdown seen across the country. If Rule proponents dispute this, they should present Illinois-specific data showing accelerating demand that aligns with ACC II's sales targets.

- a. Do you agree that vehicles generally remain registered for multiple years after the year in which they are sold as a new vehicle?

Answer: Yes, but that fact is irrelevant to our argument. The trend in total EV registrations over time still provides a clear indicator of adoption growth—or in this case, the slowing rate of growth. The data shows that while EV registrations increased by 31,459 from 2022 to 2023, that number declined slightly to 31,324 from 2023 to 2024. This indicates that EV adoption did not accelerate year-over-year, despite continued state and federal incentives.

If the proponents wish to challenge this, they should provide Illinois-specific data showing that new EV sales are increasing at the rate necessary to meet ACC II's aggressive ZEV mandates.

- b. Do you agree that your statement that "EVs comprised approximately 1.46% of registered cars and light trucks," refers to all cars and light trucks registered in Illinois, no matter when they were sold?

Answer: Yes, that figure reflects the total percentage of EVs within Illinois' vehicle fleet. This is a critical metric because ACC II mandates an aggressive phase-out of new internal combustion engine (ICE) vehicle sales—yet EVs still make up a tiny fraction of the vehicles on Illinois roads.

Even if new EV sales are occurring, the overall penetration of EVs into the Illinois market remains far below the levels needed to justify the sweeping mandates of ACC II. The fact remains: Illinois is not currently on track for the level of EV adoption ACC II requires, and real-world data does not support the proponents' assumptions.

9. On page 8 of your testimony, you point to quotes from auto industry executives indicating that they “are adjusting their strategies in response to slowing demand.” Do any of the quotations you offer relate specifically to auto-manufacturers production plans for Model Year 2029 or later?

Answer:

The statements from auto industry executives directly demonstrate that manufacturers are adjusting their EV strategies in response to slowing demand.

The idea that automakers will seamlessly scale up EV production to meet ACC II's rigid sales targets—despite clear evidence of slowing demand, production cutbacks, and shifting strategies—is completely disconnected from reality.

If the proponents wish to claim that automakers will have no issue meeting Model Year 2029 production requirements, then they should present direct statements from automakers confirming this. However, the real-world data tells a different story:

- Ford, GM, and Toyota have already reduced EV production targets for the remainder of the decade due to slowing sales.
- Tesla has experienced its first annual sales drop in over a decade, showing that even the dominant EV manufacturer is struggling to maintain growth.
- Manufacturers are prioritizing hybrids and ICE vehicle production alongside EVs because consumer demand is not aligning with aggressive electrification mandates.

Nothing about this trend suggests that by 2029, the market will suddenly and dramatically shift in favor of EVs at the rate ACC II assumes. If anything, manufacturers scaling back EV targets now is an early warning sign that ACC II's mandated timeline is completely out of step with market realities.

10. On page 9 of your testimony, you state that “[t]he rigid structure of ACC II, however, leaves no room for such flexibility” for “balancing EV production with continued demand for internal combustion engine (ICE) and hybrid vehicles.”
 - a. On page 9 of your testimony, you refer to “ACC II's assumptions.” What do you understand to be “ACC II's assumptions”?

Answer: To clarify, we should have stated "the proponents' assumptions" because ACC II itself is based entirely on the projections and modeling provided by its proponents. These assumptions, however, are deeply flawed and disconnected from real-world trends. They include:

1. EV demand will rise exponentially to meet ACC II's mandated sales targets.

- Reality: Automakers are scaling back EV production due to slowing demand, and EV adoption rates are falling short of expectations—even with heavy subsidies and incentives.
- 2. The auto industry can rapidly transition without disrupting consumer choice or dealer operations.
 - Reality: Ford, GM, and Toyota are all adjusting strategies because consumer demand is not aligning with projected adoption rates. Dealerships face significant financial risks when forced to carry inventory that is not moving.
- 3. Infrastructure development will keep pace with EV adoption.
 - Reality: Illinois still lacks widespread charging infrastructure, particularly in rural and underserved areas. Federal and state programs, while helpful, are not developing fast enough to support a mandated transition.
- 4. ACC II will be economically beneficial for Illinois.
 - Reality: The economic impact analysis fails to account for job losses in ICE-related industries, declining Motor Fuel Tax revenues, and the burden placed on lower-income consumers.

These are not our assumptions—they belong to the proponents. And if they want to mandate this policy, it is their responsibility to prove these assumptions are realistic.

- b. Is it your understanding that the proposed ACC II rules do not offer manufacturers the ability to generate compliance credits for the sale of hybrid vehicles?

Answer: Correct. ACC II does not provide manufacturers compliance credit for traditional hybrid vehicle sales.

- 11. Are you aware that the Climate and Equitable Jobs Act codifies Illinois' goal of putting one million electric vehicles on the roads of Illinois by 2030?

Answer: Yes, we are aware that the Climate and Equitable Jobs Act (CEJA) codifies a goal of putting one million electric vehicles on Illinois roads by 2030. In fact, I was directly involved in the legislative working groups that shaped CEJA. If the General Assembly had believed that adopting ACC II was necessary to achieve that goal, they could have included it in the legislation—but they did not.

CEJA, like many statutes, contains aspirational goals rather than strict mandates. The existence of a statutory goal does not mean Illinois is required to meet it at all costs—nor does it justify imposing an aggressive regulatory mandate like ACC II. Goals are not guarantees, and they certainly don't override the realities of market conditions, infrastructure limitations, or consumer demand.

- a. Based on your testimony regarding the pace of EV adoption, do you believe Illinois will meet that statutory goal under the market conditions you describe?

Answer: Given the current pace of EV adoption, it is highly unlikely that Illinois will meet the one-million-EV goal by 2030. The Illinois Secretary of State's data confirms that EV registration growth has already slowed despite continued state and federal incentives. If the proponents believe ACC II is the only way to meet that goal, they should provide evidence that EV demand is accelerating at the necessary pace—because all available data suggests the opposite.

Given that it was the Legislature who adopted this goal, they should be the appropriate body to consider policy such as this to address it.

12. On page 9 of your testimony, you assert that ACC II would “limit[] consumer choice and raise[] vehicle costs.”

- a. In that section of your testimony, from the bottom of page 9 until the middle of page 12, do you identify any studies or present any data, other than the 2024 dealership inventory figures you referred to earlier in your testimony?

Answer: Our testimony draws on multiple sources to support the assertion that ACC II will limit consumer choice and raise vehicle costs. In addition to 2024 dealership inventory data, we cite:

Pew Research Center studies showing declining consumer interest in EVs despite continued incentives.

Statements from auto industry executives confirming that EV demand has slowed, forcing manufacturers to adjust production strategies.

Economic principles of supply and demand, which dictate that limiting ICE vehicle availability while demand remains steady will drive up prices.

If the proponents wish to dispute these claims, they should present Illinois-specific market data proving that EV adoption is accelerating at the pace required to meet ACC II's mandates.

- b. Why do you believe auto manufacturers would choose to “shrink ICE vehicle production or limit ICE vehicle allocations to Illinois” when there are multiple other ways they could comply with ACC II?

Answer: We don't just believe this—your own witness testified to it during the first hearing. This is not speculation on our part; this was confirmed as a compliance option by the proponents themselves.

Manufacturers facing compliance pressure under ACC II have limited choices:

1. Reduce ICE vehicle allocations to Illinois, prioritizing states without ACC II mandates.
2. Purchase compliance credits, which are expensive and ultimately unsustainable.
3. Scale back ICE production overall, reducing consumer choice nationwide.

If compliance credit costs become prohibitive, reducing ICE availability becomes the most viable and cost-effective strategy. The proponents admitted this during testimony, so if they want to challenge it now, they should reconcile that with their own statements.

- c. Is it correct that your assertion on page 10 of your testimony that the “economic impact” of ACC II in terms of ICE vehicle availability would be “significant” is based only on your application of the “[b]asic economic principles [that] dictate that when supply decreases while demand remains steady, prices rise”? If you have any other bases for this assertion, please provide them.

Answer: No, our assertion is not only based on basic economic principles—it is also supported by real-world market data and historical trends:

Automakers are scaling back EV production (Ford, GM, Toyota) precisely because consumer demand is not growing at the rate necessary to justify a rapid ICE phase-out.

When manufacturers restrict supply of a vehicle type, prices rise—this is not hypothetical; it is a documented market reality.

The COVID-era chip shortage provides a direct comparison: When chip supply was constrained, vehicle prices skyrocketed across the board, proving that forced reductions in ICE availability under ACC II will have the same effect.

Used vehicle market dynamics—as new ICE vehicle supply shrinks, demand for used ICE models will spike, driving up prices for low-income consumers who rely on affordable transportation.

If the proponents wish to dispute this, they should provide clear economic modeling showing how ACC II would not result in ICE price inflation. Until then, the real-world evidence overwhelmingly supports our position.

- d. On page 10 of your testimony, you state: “For many Illinois consumers, ICE vehicles are not just a preference but a necessity due to their long-range capabilities, affordability, and reliability in harsh weather conditions.” Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it.

Answer: This claim is supported by:

- Illinois Secretary of State registration data, which shows that EV adoption remains low, particularly in rural counties, where long-distance travel and severe winter conditions make ICE vehicles the preferred—and often necessary—choice.
- Automaker statements and consumer surveys showing that range anxiety and extreme weather reliability are top concerns for prospective EV buyers.

- Energy grid reliability reports, which highlight the risks of relying solely on EVs in regions where extreme cold can reduce battery efficiency by up to 40%.

Illinois consumers aren't rejecting EVs arbitrarily—they are responding to real-world concerns about infrastructure, cost, and reliability. The proponents can dismiss these concerns if they choose, but the market is proving them wrong.

13. Your testimony states on page 10 that “if EV adoption fails to meet ambitious targets, automakers may simply shrink ICE vehicle production or limit ICE vehicle allocations to Illinois, rather than face enormous fines imposed by the rules.”
- a. Are you aware of automakers shrinking ICE vehicle production in, or limiting ICE vehicle allocation to, California or other states that have adopted the standards in the Proposed Rules? If so, please provide all sources of information or data demonstrating that auto manufacturers are in fact doing so.

Answer: Please see response to Question #12(b).

- b. Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it.

Answer: Please see response to Question #12(b).

- c. Are you aware of any economic analysis that demonstrates that “shrink[ing] ICE vehicle production” would be more profitable for auto-manufacturers than alternative responses they could take to ACC II? If so, please provide those analyses.

Answer: Please see response to Question #12(b).

14. You state, on page 11 of your testimony, that the adoption of ACC II in Illinois would “disproportionately affect[] rural and low-income residents.” Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it.

Answer: According to the ‘Driving a Cleaner Illinois’ webpage and interactive map managed by the Illinois Environmental Protection Agency, charging infrastructure remains highly concentrated in select counties:

- **44 counties** in Illinois have **no state-funded EV chargers** (awarded or operational).
- **35 counties** have **awarded state-funded chargers**, but none are yet online.
- Only **23 counties** have at least one operational state-funded EV charger.

This means that **79 of Illinois' 102 counties (77%)** lack any operational state-funded EV charging infrastructure as of of March 1, 2025.⁶

(<https://epa.illinois.gov/topics/air-quality/driving-a-cleaner-illinois.html>)

15. On page 11 of your testimony, you state: "In 2024, data showed that EVs sat on dealership lots nearly twice as long as ICE vehicles, reflecting slower consumer adoption despite substantial government incentives."

a. Is it correct, then, that your assertions about the pace of EV adoption are based on your observations of market conditions that are shaped by a combination of currently available government incentives for EV purchases and the existing rules that apply to vehicle manufacturers?

Answer: Yes, our assertions about the pace of EV adoption are based on real-world market data—not assumptions, not speculative modeling, and certainly not wishful thinking. The fact that EVs are sitting on dealership lots nearly twice as long as ICE vehicles is a direct economic indicator of consumer demand.

That demand remains weak despite billions in state and federal incentives, aggressive manufacturer discounts and financing offers, and years of government policies pushing EV adoption.

This is not just an observation. If the proponents believe that the market will suddenly and dramatically shift in line with ACC II's mandates, they should present data proving that EV demand is accelerating at the required pace. All available evidence suggests the opposite.

16. Can you explain why you chose not to include in your testimony any specific discussion of several government programs assisting EV purchasers, including the Illinois EV rebate offering \$4,000 for new and used EV purchases with a priority on low-income purchasers, as well as federal rebates offered to EV purchasers?

Answer: Our testimony did acknowledge the existence of substantial financial incentives, yet the data clearly shows that EV adoption in Illinois is still lagging.

IADA and the National Auto Dealers Association (NADA) have long supported incentives that make vehicles more affordable for consumers, and we have publicly stated our support for policies that encourage EV adoption through financial assistance rather than government mandates. We will provide references accordingly.

The previous question literally referenced us discussing incentives—so why are they now implying that we ignored them? This is an unnecessary and redundant question.

⁶ "Electric Vehicle Charging Station Supported/Funded by the State of Illinois." Accessed March 3, 2025. https://experience.arcgis.com/experience/1b71ab7f02cd424581ede5cdf28b37f6#data_s=id%3A42782518107b47f89eaa53978edceb5e-1932b579750-layer-2%3A13.

The fact that Illinois has already provided generous financial incentives, yet EV adoption has still not accelerated to the level needed for ACC II, is an indictment of their case. If incentives alone were enough to drive rapid adoption, we wouldn't be seeing slowed growth, longer dealership lot times, and manufacturers pulling back production. The market has spoken.

If the proponents believe incentives will be enough to achieve ACC II's mandates, they should provide data showing that Illinois is on pace to meet the required EV sales targets. Right now, all evidence suggests otherwise.

17. On page 11 of your testimony, you address the possibility that auto-manufacturers could use credit-trading under ACC II as a compliance strategy and assert that “[c]redits are often available only from a handful of manufacturers” and are “expensive and limited.” Your testimony cites no data or sources to support these claims, correct? If you did rely on any data or information as the basis for these claims, please provide it.

Answer: Our testimony is based on real-world market trends and the basic economic reality of compliance credit trading, which has long been a feature of regulatory programs like ACC II. If the proponents wish to dispute our claims, they should provide data showing that credits will be widely available, affordable, and a sustainable long-term compliance strategy for all manufacturers.

- a. Please specify what dollar value you believe makes an ACC II compliance credit “expensive.”

Answer: The cost of compliance credits is dictated by supply and demand, which fluctuate based on how many manufacturers meet ZEV targets and how many fall short. While precise future credit costs are speculative, historical precedent from California's Zero-Emission Vehicle (ZEV) program shows that credits have traded for thousands of dollars per vehicle in certain compliance cycles.

More importantly, the uncertainty and volatility of credit prices create a financial risk for automakers. If compliance credits become too expensive, manufacturers will seek the more predictable and cost-effective strategy of reducing ICE vehicle allocations, rather than relying on an uncertain credit market to meet mandates.

- b. What experience or first-hand knowledge do you have with respect to credit trading under ACC II?

Answer: ACC II is based on California's regulatory framework, which has decades of history with compliance credit trading. We have extensively reviewed California's ZEV credit market and the compliance challenges it has created for automakers. This is not uncharted territory—manufacturers have already been forced to navigate the unpredictable and often expensive credit market in California, and the same risks will apply in Illinois.

Furthermore, if the proponents claim that credit trading will provide sufficient flexibility for automakers, they should provide data on projected credit availability and cost estimates.

- c. You assert these aspects of the credit market would make “reducing ICE production a more viable and cost-effective compliance strategy.” Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it.

Answer: Please see response to Question #12(b) and Question #13.

Additionally, this is not speculation—this was confirmed as a compliance option by the proponents' own witness during the first hearing. If credits become expensive or difficult to obtain, automakers will choose the simplest and most cost-effective compliance strategy: reducing ICE vehicle availability in Illinois. If the proponents want to argue otherwise, they should present statements from automakers guaranteeing that ICE production and allocations will remain unchanged.

18. Did your opinions on economic impacts to consumers take into account the economic effects of health issues attributable to vehicle emissions?
 - a. If not, why not?

Answer: Our testimony focuses on the direct economic impacts of ACC II on consumers, businesses, and Illinois' transportation funding. It is not within the scope of our analysis to evaluate the public health cost-benefit claims made by proponents, nor are we obligated to accept their conclusions without scrutiny.

- b. If so, please provide any data or studies you relied on and the reason for omitting this economic factor in your original testimony.

Answer: Our testimony does not dispute that vehicle emissions contribute to air quality concerns, but we reject the false choice that reducing emissions can only be accomplished through ACC II. Illinois has already taken major steps to reduce emissions through policies like the Climate and Equitable Jobs Act (CEJA) and continued improvements in fuel efficiency, hybrid adoption, and alternative clean transportation solutions.

Public health is important, but so is economic reality. ACC II's rigid, one-size-fits-all mandate comes with enormous costs, and those must be weighed against any claimed benefits. The proponents have failed to do so.

19. On page 12 of your testimony, you state, “The ambitious goals of the ACC II Rule, requiring 59% EV adoption by 2028 and 100% by 2035, present significant challenges to Illinois’ energy infrastructure and charging network.”

- a. Is it correct that your testimony does not address the Climate and Equitable Jobs Act provisions related to energy infrastructure and charging network buildout?

Answer: The proponents cannot have it both ways. On one hand, they claim that Illinois must adopt ACC II because there is no other viable path forward. On the other hand, they tout the state’s existing efforts—CEJA’s energy infrastructure provisions, federal funding, and state-level investments—as proof that EV adoption is well underway. If Illinois has already committed hundreds of millions of dollars to EV infrastructure and electrification through legislative action, then why is an additional regulatory mandate necessary?

Furthermore, CEJA was crafted, debated, and passed by the General Assembly—a legislative body elected to represent the interests of Illinois residents. If the legislature believed that adopting California’s ZEV mandates was essential to achieving its clean energy goals, it could have included ACC II in CEJA—but it did not. Instead, proponents are attempting to force this transition through rulemaking, sidestepping the legislative process entirely.

Of course we are aware of CEJA, but our testimony focuses specifically on the impacts of ACC II. CEJA is a separate legislative framework passed by the General Assembly, while ACC II is a regulatory mandate being pursued through rulemaking. The two are distinct, and it is misleading for proponents to suggest that CEJA automatically justifies ACC II.

- b. Are you aware that Illinois has committed hundreds of millions of dollars to electric vehicle infrastructure through various programs, with specific mandates by the General Assembly that infrastructure improvements are to be focused “especially in low-income and environmental justice communities, where levels of air pollution burden tend to be higher”?

Answer: Yes, but again, this raises a fundamental question—if EV adoption is already well-supported through legislative action, why is ACC II necessary? The General Assembly has allocated funding for EV infrastructure, but it has not mandated an aggressive phase-out of ICE vehicles, nor has it chosen to adopt California’s ZEV standards. That decision was left to Illinois policymakers, and ACC II proponents are now attempting to bypass them.

- c. Are you aware that the Climate and Equitable Jobs Act includes requirements for electric utilities to implement and financially support charging infrastructure build-out through a “Beneficial Electrification Plan” process before the Illinois Commerce Commission? Has the IADA participated in those proceedings in any capacity?

Answer: Yes, we are aware of the Beneficial Electrification Plan requirements under CEJA. However, those proceedings are not about mandating vehicle sales—they are about expanding

access to charging infrastructure. CEJA's approach reflects a measured transition, whereas ACC II forces a rigid timeline without considering whether infrastructure expansion can keep pace.

- d. You state on page 10 of your testimony that "[i]n these [rural and suburban] communities, charging infrastructure remains sparse, making EV adoption impractical." Please identify all sources of information you relied upon as the basis for this statement.

Answer: This statement is supported by:

- Illinois Commerce Commission EV Infrastructure Reports, which document gaps in charging access, particularly in rural regions.
- U.S. Department of Energy data, which confirms that charging stations are disproportionately concentrated in urban areas, leaving rural communities with significantly fewer options.
- Federal Highway Administration NEVI program reports, which acknowledge that large portions of Illinois lack adequate EV charging coverage.
- Illinois Secretary of State EV registration data, which shows that EV adoption remains concentrated in Chicago and other metropolitan areas while lagging in rural counties.

If the proponents wish to dispute this, they should present Illinois-specific data showing that rural and suburban EV infrastructure is sufficient to support ACC II's mandated transition. The fact that Illinois is still receiving federal funding for infrastructure expansion is proof that the network is not yet adequate—otherwise, this funding wouldn't be necessary

20. Your testimony states on page 12 that "[s]tudies by the U.S. Department of Energy (DOE) and the National Renewable Energy Laboratory (NREL) provide critical insights into the scale of development necessary for widespread EV adoption."

- a. Is it correct that these studies reviewed nationwide data?

Answer: Yes. The DOE and NREL studies reviewed nationwide electricity demand growth under widespread EV adoption. These studies provide a comprehensive view of potential changes in electricity demand and infrastructure needs across various regions of the United States.

- b. Your testimony further states, on page 12, that "[t]he DOE's Electric Vehicles at Scale report projects a 25–50% increase in total electricity demand in regions with widespread electrification by 2050." Can you please point specifically to where support for this statement appears in the source you identified in your testimony at page 12, footnote 8?

Answer: In reviewing our original testimony, we realize there was a citation error. The statement regarding a projected "25–50% increase in total electricity demand in regions with widespread electrification by 2050" was incorrectly attributed specifically to a "DOE Electric Vehicles at Scale report," which was inaccurately referenced.

However, numerous credible studies conducted by the U.S. Department of Energy (DOE), the National Renewable Energy Laboratory (NREL), and independent research organizations do substantiate our assertion of a substantial increase in electricity demand resulting from widespread vehicle electrification:

- National Renewable Energy Laboratory (NREL) Electrification Futures Study (2018) estimates that under high EV-adoption scenarios, national electricity consumption could increase by approximately 38% by 2050 compared to baseline projections.
- A more recent 2024 DOE Transportation Decarbonization study (TEMPO model results) projects that very high EV sales could push electricity demand approximately 25–75% higher than today's levels by mid-century, with the midpoint of that range being approximately 50%.
- The independent Electric Power Research Institute (EPRI) has also forecast cumulative U.S. electricity load growth from electrification to be between 24% and 52% by 2050 across various scenarios.

These rigorous analyses—from authoritative, neutral institutions—consistently demonstrate plausible scenarios wherein U.S. electricity demand rises on the order of 25–50% by 2050 under significant EV adoption, closely aligning with the range cited in our testimony.

We therefore clarify our original reference: the "25–50% increase" figure is well-supported by multiple credible, data-driven DOE, NREL, and EPRI studies, even though our original testimony mistakenly referenced a specific DOE report title that was not accurate. We appreciate the opportunity to correct and clarify this citation.

- c. You further state, on page 13 of your testimony, that “[e]xtrapolating these figures out for Illinois translates to an additional 7,500–15,000 MW of capacity.”

- i. How did you “extrapolat[e] these figures out for Illinois”?

Answer: According to the State Energy Risk Profile of Illinois by the U.S. Department of Energy (https://www.energy.gov/sites/prod/files/2016/09/f33/IL_Energy%20Sector%20Risk%20Profile.pdf), Illinois’ annual electricity consumption is 143.5 TWh (or 143,500 GWh).

Applying the national 25–50% electricity demand increase range cited in DOE/NREL/EPRI studies, Illinois would require:

- A 25% increase would now equate to +35,875 GWh (total: ~179,375 GWh)
- A 50% increase would now equate to +71,750 GWh (total: ~215,250 GWh)

To translate this into additional generating capacity (MW), we assume an average system-wide capacity factor of ~50%, which reflects a mix of baseload, renewables, and peaking resources.

Translating this into capacity requirements (MW) at a 50% capacity factor:

- 25% growth → ~7,300 MW of new capacity needed
- 50% growth → ~14,600 MW of new capacity needed

Using this updated baseline, we can refine the projected increase in electricity demand due to widespread EV adoption.

If proponents disagree with this methodology, they should provide Illinois-specific studies showing how the state will supply the additional load required under ACC II.

21. On page 13 of your testimony, in reference to the data identified in the preceding question, you state: “Addressing this demand would require expanding energy generation, constructing new transmission lines to serve rural and underserved areas, and integrating public DC fast chargers into the grid. Often costly and logistically complex, the latter would likely result in higher consumer rates as utilities recoup interconnection expenses.” Your testimony cites no data or sources to support these claims, correct? If you did rely on any data or information as the basis for these claims, please provide it.

Answer: The suggestion that DC fast chargers and grid upgrades are not costly and logistically complex is absurd. If the proponents are claiming otherwise, they should provide documentation from the ICC, IEPA, and IDOT stating that Illinois' grid and infrastructure will be fully prepared to meet the electricity demand of ACC II and ACT. If such assurances exist, they should submit them on record.

The fact is, DC fast chargers are significantly more expensive than Level 2 chargers—this is well-documented across multiple studies and real-world infrastructure projects

a. Are you aware that these infrastructure changes are currently the subject of programs managed by and proceedings before other state agencies, including the ICC, IEPA and IDOT?

Answer: I do not understand what the Rule Proponents mean by the phrase "these infrastructure changes." To provide an accurate and responsive answer, I would ask the Rule Proponents to clarify which specific infrastructure changes they are referencing.

b. Has the IADA participated in those proceedings or engaged with those state agencies on those topics in any capacity? If so, please describe.

22. Your testimony states on page 13: “The Proponents’ ...projection relies heavily on residential charging, which accounts for 97–98% of the total, overlooking critical urban realities.” Please explain what you mean when you say residential charging “accounts for 97-98% of the total.”

Answer: ERM’s 97–98% residential charging estimate is based on their projection that Illinois will need 5.2 million home Level 2 chargers, 29,699 public Level 2 chargers, and 18,729 public DC fast chargers by 2050. ERM’s calculation significantly underestimating public charging demand.

This assumption ignores the realities of urban and multifamily housing where home charging is not an option.

23. Your testimony states on page 13: “Many Illinois residents, particularly those in multifamily housing, lack private parking or the ability to install home chargers, making robust public infrastructure essential.” Are you aware that Illinois has passed legislation aimed at addressing this problem, including the Electric Vehicle Charging Act, P.A. 103-0053, which gives renters the right to install EV chargers?

Answer:

Yes, we are aware of the Electric Vehicle Charging Act (P.A. 103-0053), which gives renters the right to install EV chargers. However, simply granting renters the right to install chargers does not eliminate the financial and logistical barriers that prevent them from doing so.

- Not all rental properties can accommodate EV chargers. Many multi-unit buildings, particularly in dense urban areas, lack dedicated parking or have outdated electrical infrastructure that cannot support widespread charger installation.
- Installation costs remain a major hurdle. Even with the legal right to install a charger, renters must still cover thousands of dollars in electrical upgrades and installation costs—expenses that many lower-income residents cannot afford.
- The Act does not solve the problem of public charging shortages. Renters who cannot install home chargers will still rely on public infrastructure, which remains limited, expensive, and often unreliable.

More importantly, the existence of this law reinforces our argument: If Illinois policymakers believed ACC II was necessary, they could have passed it through the General Assembly—but they didn’t. Instead, they have chosen targeted legislative solutions to EV adoption challenges, rather than forcing an across-the-board mandate.

24. On page 14 of your testimony, you cite a 2024 report, *Overcoming Roadblocks in California’s Public EV Charging Infrastructure*, and then state that the findings of this report describe “a goal described by experts as ‘unlikely.’” Please identify any experts to whom you attribute that quote, along with any supporting reference material.

Answer: The quote comes directly from the findings of the 2024 Stanford Institute for Economic Policy Research (SIEPR) report, *Overcoming Roadblocks in California’s Public EV Charging Infrastructure*. The report outlines the significant infrastructure challenges California faces in meeting its EV charging goals, despite massive state and federal investments.

If the proponents wish to challenge this characterization, they should provide evidence from non-biased, independently conducted studies—not industry-funded reports—showing that California is actually on track to meet its charging infrastructure targets.

More importantly, if California—arguably the most EV-friendly state in the country—cannot realistically meet its infrastructure targets, what assurances do the proponents have that Illinois will succeed where California is struggling? If the proponents have Illinois-specific, non-industry-funded analysis showing that the state’s charging network will be fully prepared for ACC II, they should submit it into the record.

25. On page 15 of your testimony, you raise questions about grid reliability. Are you aware that Illinois ranks first in the nation in grid reliability according to U.S. News & World Report?

Answer: While Illinois has historically maintained a reliable power grid, ACC II would place significant strain on the grid.

26. On page 16 of your testimony, you criticize Rule Proponents’ economic benefit projections. Your criticism relates only to projections related to job creation, correct?

Answer: No. Our testimony critiques multiple aspects of the proponents’ economic benefit projections—not just job creation.

The proponents claim ACC II will generate \$86.4 billion in net economic benefits, yet their own ERM analysis projects a net gain of only 60 jobs in Illinois by 2050. That’s an average of two jobs per year—a laughably small number that does not justify the sweeping economic disruption this rule will cause.

The projected "billions in economic benefits" are based on assumptions about fuel savings, environmental health benefits, and market transformation that have not materialized as expected in other states that have adopted ACC II. If the proponents want to argue that these projections are realistic, they should provide real-world evidence that similar policies have delivered these benefits at the scale they claim.

Our testimony highlights the real-world costs and risks of ACC II—costs that the proponents have failed to address. If they disagree, they should present evidence demonstrating that Illinois is on track for the economic transformation they claim will occur.

27. On page 16 of your testimony, you refer to “hefty” fines for non-compliance and, elsewhere on page 10, describe such possible fines as “enormous.” What analysis have you done as a basis for your characterizations of potential fines as “hefty” or “enormous”? On what basis do you opine as to how such fines would be perceived by the global automakers to which such fines would apply?

Answer: The characterization of ACC II's non-compliance fines as "hefty" or "enormous" is grounded in clear regulatory precedent and the explicit statutory language outlined in the Environmental Protection Act (415 ILCS § 5/42). By any reasonable standard, a fine of up to \$50,000 per vehicle is substantial, particularly when scaled across thousands of potential non-compliant vehicles.

Global automakers facing potential penalties at this scale would view these fines as significant economic risks, directly influencing their strategic decisions, such as pricing, inventory allocation, and market participation. Potential outcomes include higher vehicle prices for Illinois consumers, reduced vehicle availability, and possible shifts in investment and production away from Illinois or other states adopting similar aggressive mandates. These are not speculative outcomes; similar dynamics have been observed in other markets responding to stringent regulatory mandates.

28. You mention on page 17 of your testimony that rural areas will be the hardest hit by gas station closures. What analysis did you perform to assess the likely rates of gas station closures or the geographic distribution of such closures during the period before and during the ACC II timeframe included in the Proposed Rules (i.e. between now and 2035)?

Answer: Gas station closures in rural areas are an inevitable consequence of a government-mandated transition away from gasoline-powered vehicles. This is not speculation—it is a well-documented market trend in regions that have seen declining fuel demand. The assertion that rural communities will be the hardest hit is based on fundamental economic realities, industry trends, and existing infrastructure limitations.

Gas station viability depends on fuel sales volume. As demand declines under ACC II, stations with lower traffic—particularly in rural areas—will struggle to remain profitable. This is exactly what happened when diesel demand dropped in certain regions, forcing independent fuel providers out of business.

Many rural gas stations operate on thin margins. Unlike urban locations that can supplement revenue with high customer volume, rural stations rely heavily on fuel sales to remain operational. Without that revenue stream, closures are unavoidable.

Proponents have provided no analysis showing that rural gas stations will remain viable under ACC II. If they believe gas stations will successfully transition to EV charging hubs, they should present economic data proving that these conversions are financially sustainable at scale in rural Illinois.

a. Did you consider that gas stations may add, convert to, or be replaced by, electric charging stations?

Answer: Yes, but converting a gas station to an EV charging hub is neither simple nor financially viable for most rural locations.

DC fast chargers are significantly more expensive to install than fuel pumps, requiring costly electrical upgrades and permitting hurdles.

Charging times are exponentially longer than fueling times. A gas station thrives on high customer turnover; a location that requires 30–45 minutes per vehicle is not an equal substitute. By comparison, filling a gas tank takes 2–3 minutes. This is a complete shift in the business model, making profitability far more challenging.

Many rural gas stations lack the necessary electrical infrastructure. Upgrading to support high-powered chargers is an expensive, multi-year process that is not feasible for many small business owners.

Most charging stations lack basic consumer conveniences. Gas stations provide bathrooms, food, drinks, and essentials—most EV chargers are placed in isolated parking lots with no amenities, making long charge times even less practical for rural residents.

b. Are you aware that some gas stations in rural areas are already using state grants to install EV chargers?

Answer: Yes, we are aware that some grants exist, but this does not mean the infrastructure is developing at the scale necessary to prevent widespread gas station closures.

A handful of grant-funded installations does not equal an industry-wide transition. Many rural gas stations are independently owned, and even with grants, the costs of transitioning remain prohibitive.

If grant programs were sufficient, why does Illinois continue to have charging deserts in rural regions? The fact that state funding is still being allocated for charging expansion proves that the current infrastructure is inadequate.

Again, if the proponents wish to claim that state grants are preventing gas station closures, they should provide data showing how many rural locations have successfully transitioned to profitable EV charging hubs.

c. You note on page 17 of your testimony that Illinois already has workforce training programs “like the Clean Jobs Workforce Hubs” aimed at smoothing market transitions for employees. What prevents such existing programs from being improved to address the limitations in scope and other shortcomings you assert?

Answer: Nothing prevents these programs from being improved—but the fact remains that they currently are not sufficient to address the job losses and economic disruptions caused by ACC II.

The existence of a workforce program does not guarantee that displaced workers can transition seamlessly into new careers. These programs must be accessible, properly funded, and aligned with real workforce needs.

Many workers in affected industries—mechanics, gas station employees, refinery workers—do not have a direct or immediate transition path into EV-related jobs. The skill gap is significant, and retraining takes time.

If workforce programs were adequate, the proponents should provide job placement data showing how many displaced ICE-related workers have been successfully retrained in states that have already adopted ACC II.

The burden is not on us to prove these programs are insufficient—the burden is on the proponents to prove they are capable of addressing the displacement ACC II will cause.

29. Please refer to the portion of your testimony, on pages 18–19, with the heading “Rivian and Stellantis.”

a. Are you aware that, in the weeks after you submitted your testimony, Stellantis reversed the plans you described and has committed to reopening the Belvidere Assembly plant?

Answer: Yes, IADA is aware of Stellantis’s recent announcement reversing its initial decision and committing to reopening the Belvidere Assembly plant. However, our core concern remains valid: investment decisions by manufacturers are volatile and sensitive to market conditions and consumer demand. Stellantis’ initial decision to close Belvidere reflected the vulnerability of Illinois auto manufacturing jobs in a rapidly changing vehicle marketplace. While the recent reversal is encouraging, it underscores how fragile commitments can be, especially under the added uncertainty created by strict regulatory mandates like ACC II.

b. Are you further aware that this commitment to the site’s revival ended the dispute between Stellantis and United Auto Workers over union workers’ jobs at the plant?

Answer: Yes, but once again, this does not erase the fact that Stellantis initially left these workers and the community in limbo. Had ACC II already been in effect during this period of uncertainty, how would this rule have helped those workers who were out of a job for nearly two years?

If proponents want to use Stellantis as proof of ACC II’s benefits, they should explain why the Belvidere plant sat idle for as long as it did in the first place.

c. Are you aware that Rivian recently received a \$6.57 billion federal loan from the Department of Energy to support the construction of an EV manufacturing facility in Georgia?

Answer: Yes, we are aware of Rivian’s federal loan, but this has nothing to do with ACC II or Illinois. In fact, Georgia is not a CARB state—so by the proponents’ logic, why didn’t Rivian build this facility in California, Washington, or Oregon?

Furthermore, Rivian came to Illinois when Illinois was not a CARB state. If ACC II is such a necessary policy to attract EV investment, why did Rivian choose Illinois in the first place? This undercuts the proponents’ argument that adopting ACC II is essential for economic development.

d. Do you dispute that adoption of the Proposed Rules would provide support for the EV market, encouraging EV manufacturers operating or based in Illinois?

Answer: The EV market does not need forced government mandates to be successful—it needs consumer demand, stable supply chains, and sustainable business models.

- Rivian came to Illinois before ACC II existed.
- Automakers are already adjusting their strategies due to weakening EV demand, with or without regulatory pressure.
- Ford, GM, and Toyota have reduced EV production targets, proving that mandates cannot force demand where it does not exist.

If the proponents believe ACC II is necessary for EV market growth, they should provide data showing that automakers are making investment decisions based specifically on ACC II adoption. So far, they have not.

e. Your testimony on page 19 states that “legacy automakers like General Motors, Ford, and Toyota have scaled back their EV targets, collectively reducing projections for 2030 by over 3 million vehicles.”

i. Could you please identify the sources for this information?

Answer: Our statement is based on public statements from automakers and industry reports.

ii. Does the “over 3 million vehicles” figure you offer relate to those manufacturers’ global EV production?

Answer: Yes, it reflects global EV production targets that have been revised downward due to weaker-than-expected consumer demand, supply chain challenges, and economic realities.

iii. Does that “over 3 million vehicles” figure reflect EV production targets for the year of 2030 or over some different timeframe?

Answer: The figure reflects cumulative reductions in EV production targets leading up to 2030, as automakers reassess their electrification strategies in response to real-world market conditions.

30. Your testimony on pages 19 through 20 addresses concerns related to levels of revenue from the Motor Fuel Tax.

a. Do you agree that IDOT has projected a \$36 billion shortfall for Illinois infrastructure needs without any consideration of the Proposed Rules?

Answer: We would like to take this time to point out that the proponents are once again attempting to shift attention away from their own failure to address the Motor Fuel Tax (MFT). The fact that IDOT has projected a \$36 billion infrastructure funding shortfall without ACC II in place only reinforces the reality that ACC II will make this problem even worse by accelerating fuel tax revenue declines without providing any alternative funding solution.

To answer #30 (a), yes, and that only makes the proponents' failure to address this issue even more glaring. If IDOT has already identified a massive infrastructure funding crisis, why are the proponents pushing a rule that will further deplete transportation revenues without proposing a solution? If the proponents want to argue that ACC II will not worsen the problem, they should provide data proving that MFT revenue declines will not be accelerated under this mandate.

b. Do you agree that the IDOT-projected \$36 billion shortfall represents a significant policy problem that the State will need to address regardless of the outcome of this proceeding?

Answer: Yes, and the proponents have had every opportunity to address it—but they haven't. They filed this rule in July 2023 and have failed to provide any policy solution for how to replace lost MFT revenues—not in their initial filing, not in previous hearings, and not in their responses to direct questions. The burden is on them to explain why they are advancing a rule that will worsen an already acknowledged fiscal crisis while refusing to propose a funding replacement.

c. Do you agree that the Pew report you cite concludes that the traditional fuel tax model will be inadequate whether or not Illinois adopts ACC II?

Answer: Yes, but that does not justify ignoring the fact that ACC II will accelerate the decline of MFT revenues. If the proponents are acknowledging that the fuel tax model is already in trouble, why are they pushing a rule that will make it worse without offering a solution?

d. Do you agree that the Congressional Budget Office warning that you cite was also not based on Illinois's adoption of ACC II?

Answer: Yes, but again, this does not change the fact that ACC II will worsen the issue. The CBO report highlights the national risks associated with declining fuel tax revenues, and ACC II would force an even faster transition away from gasoline-powered vehicles, further draining the revenue Illinois relies on for roads and infrastructure.

31. On pages 19 through 20, your testimony states: "The Pew report highlights that EVs weigh approximately 30% more than internal combustion engine (ICE) vehicles due to their batteries. This added weight accelerates wear and tear on roads and bridges, requiring higher maintenance expenditures at a time when funding sources are already shrinking." Please provide all data and analysis on which you relied to project any additional infrastructure costs, or to project the rate of degradation to roads and bridges, that would be attributable to increased vehicle weights on Illinois roads as a result of promulgation of the Proposed Rules.

Answer: The assertion that heavier vehicles cause increased wear and tear on roads and bridges is not speculation—it is basic physics and engineering. If the proponents wish to dispute this, they should provide evidence proving that heavier EVs will not contribute to increased road degradation and maintenance costs.

- The Pew report confirms that EVs weigh approximately 30% more than ICE vehicles due to their batteries.
- Heavier vehicles create greater stress on pavement, leading to faster deterioration. This principle is well-documented in civil engineering and transportation studies.
- Illinois' infrastructure funding is already facing a \$36 billion shortfall. Increased maintenance costs will only add to this crisis, yet the proponents have offered no solution to address it.

If the proponents are asking for a precise dollar amount on how much additional road degradation will cost Illinois, perhaps they should have conducted that analysis themselves before filing this rule. If they have Illinois-specific data proving that heavier EVs will not increase infrastructure costs, they should submit it into the record.

32. On page 22 of your testimony, you state that “current EV procurement incentives overwhelmingly favor affluent households, who are more likely to purchase new EVs.”

a. Did the Nunes et al. study you cite review specific policies in Illinois?

Answer: The Nunes et al. study examines national trends in EV adoption and policy impacts, which are relevant to Illinois because the same federal incentives and market dynamics apply here. If the proponents believe Illinois-specific data contradicts these findings, they should provide it.

b. Do you dispute that affluent households are more likely to purchase new vehicles generally?

Answer: No, and that's exactly our point. Since new EVs are significantly more expensive than comparable ICE vehicles, EV incentives overwhelmingly benefit wealthier households who are already in the market for new cars.

The fact that affluent consumers buy more new vehicles does not change the reality that EV policies, as currently structured, disproportionately benefit higher-income buyers while offering little to those who rely on the used vehicle market.

c. Do you dispute that a higher rate of new EV purchases would, eventually, lead to a higher rate of used EVs for sale?

Answer: No, but the key word here is "eventually." Used EVs do not enter the market quickly enough to provide affordable options for lower-income consumers in the near term.

The average length of new vehicle ownership is 8–12 years, meaning it will take at least a decade before today's new EVs become widely available in the used market at affordable prices. Meanwhile, Illinois is mandating a ZEV transition now, not in 10–15 years—leaving low-income buyers with fewer affordable options.

The question is not whether used EVs will eventually become available—it's whether lower-income consumers will be able to afford reliable transportation during the forced transition.

d. Are you aware that the proposed ACC II rule includes specific credits for EV sales in environmental justice communities, such that auto manufacturers will have additional financial incentive to find ways to reach low-income consumers?

Answer: Yes

e. Are you aware that Illinois has prioritized equity in the transition to electric vehicles through legislation such as CEJA,⁷² including the creation of an Energy Transition Assistance Fund prioritization of EV infrastructure in low-income communities, and an electric vehicle rebate program that prioritizes applications from low-income and environmental justice communities?

Answer:

Yes, but prioritizing applications does not mean EVs are affordable for these communities.

- The Illinois EV rebate program runs out of funding quickly and is not guaranteed to reach all low-income applicants.
- The upfront cost of an EV remains a barrier, even with rebates, because most low-income consumers cannot afford a \$50,000 vehicle even after a \$4,000 or \$7,500 rebate.
- Infrastructure challenges in low-income areas remain a major hurdle. Simply allocating funds does not mean the infrastructure is being developed at a sufficient pace to meet demand.

If the proponents believe Illinois' programs are sufficient to bridge the affordability gap, they should provide data proving that EV adoption rates in low-income communities are keeping pace with wealthier areas.

f. Where, if at all, does your testimony address other options for EV payments aside from direct EV purchases, such as leasing?

Answer:

Our testimony focuses on vehicle affordability, regardless of payment method.

- Leasing does not solve the fundamental affordability problem, as lease terms still require down payments, monthly payments, and insurance costs that remain higher for EVs.
- Consumers who lease must still have access to home or public charging, which remains a major barrier in low-income and rural communities.

If the proponents believe leasing resolves affordability issues, they should provide data showing that lower-income consumers are leasing EVs at a rate that supports ACC II's adoption targets.

g. Where, if at all, does your testimony address the inequitable effects of air pollution from motor vehicles on lower-income households and communities?

Answer:

Our testimony does not dispute that vehicle emissions impact public health. However, ACC II is not the only way to achieve emissions reductions, and it does so at a significant financial burden to lower-income communities.

If the proponents are framing ACC II as an equity-focused rule, then they must also account for the financial harm it imposes on the very communities it claims to help.

- A cleaner environment is meaningless if low-income residents cannot afford reliable transportation.
- A lower-pollution future is not equitable if working-class families are forced into financial hardship to comply with EV mandates.
- The policy must be judged on real-world affordability, not just long-term environmental benefits.

A balanced approach that includes consumer choice, hybrid adoption, and targeted emissions reduction policies would allow Illinois to address both environmental concerns and economic realities without disproportionately harming those least able to afford this transition.

Furthermore, the Proponents fail to provide the evidence that this Statewide mandate is necessary. In their initial filing, they file a study on Asthma only in the Chicagoland area. They do not address why this is needed anywhere else in the State.

33. At pages 24 and 25 of your testimony, you discuss hybrid vehicles as a feasible, scalable part of the electric vehicle transition. Are you aware that ACC II credits Plug-In Hybrid Electric Vehicles (PHEVs) of sufficient range as though they were ZEVs?

Answer: Yes, we are aware that ACC II grants some compliance credits for Plug-In Hybrid Electric Vehicles (PHEVs) that meet specific range requirements—but this does not change the fact that gas-powered hybrids, including the best-selling hybrid of all time, the Toyota Prius, would be prohibited from being sold new in Illinois after 2035.

- Traditional (non-plug-in) hybrid vehicles do not qualify for compliance under ACC II. This means that popular, fuel-efficient hybrid models—including the Prius, Honda Accord Hybrid, and Toyota RAV4 Hybrid—will be banned from new sales in Illinois starting in 2035.
- The inclusion of certain PHEVs in the rule does not make this a flexible policy. Automakers will be required to phase out all traditional gas-powered hybrids, even though these vehicles provide substantial emissions reductions and are a preferred choice for many consumers who are not ready for full EV adoption.
- Consumers who want fuel-efficient, gas-powered hybrids will have zero options under ACC II. That is not “consumer choice,” that is a forced transition that ignores market realities.

If the proponents believe ACC II adequately allows for hybrid adoption, they should state on record that the Prius and other standard hybrids will still be available for new sales after 2035.

34. On pages 25 and 26 of your testimony, you make assertions about the Proposed Rules' "Alignment with Illinois' Energy Profile." Please identify all sources of data or information that specifically address Illinois which you relied on in forming the opinions you present in that section of your testimony.

Answer: The statements made in this section are based on widely accepted data and studies on Illinois' energy mix, EV lifecycle emissions, and grid reliance on fossil fuels.

Exhibit A

ObjectID	Site Host	Site Type	Level 2 Por	Level 3 Por	Online Stat	Grantee	Program Ty	City	County	LatDD	LongDD	GlobalID	x	y
1	South Park Mall	Big Retail			4	Awarded (L Francis En	NEVI	Moline	Rock Island	41.46768	-90.5031	b61de9be-	-90.5031	41.46768
2	Love's Travel Stop, Store #687	Gas Stations			6	Awarded (L Love's Trav	NEVI	So Jackson	Morgan	39.68962	-90.2299	63eba86e-	-90.2299	39.68962
3	La Quinta Inn & Suites by Wyndham	Hotels			4	Awarded (L Universal E	NEVI	Collinsville	Madison	38.68282	-90.0171	e8ec9dec-	-90.0171	38.68282
4	Love's Travel Stop, Store #583	Gas Stations			6	Awarded (L Love's Trav	NEVI	New Bader	St Clair	38.53445	-89.7326	b5eb42c8-	-89.7326	38.53445
5	Burger King	Gas Stations			4	Awarded (L Francis En	NEVI	Litchfield	Montgome	39.17601	-89.6746	f1134e6d-	-89.6746	39.17601
6	Kohl's 956	Big Retail			6	Awarded (L EVgo Serv	NEVI	East Peoria	Tazewell	40.67037	-89.5769	b9eddb67-	-89.5769	40.67037
7	Casey's 3531	Gas Stations			4	Awarded (L Francis En	NEVI	Princeton	Bureau	41.39611	-89.4677	bac2b9ec-	-89.4677	41.39611
8	Love's Travel Stop, Store #754	Gas Stations			6	Awarded (L Love's Trav	NEVI	Rochelle	Ogle	41.89808	-89.0667	03caac9d-	-89.0667	41.89808
9	Modern Stay 39 Lakeview by OYO	Hotels			4	Awarded (L Universal E	NEVI	Minonk	Woodford	40.91338	-89.0553	9029f956-	-89.0553	40.91338
10	Petro Travel Center	Gas Stations			6	Awarded (L Electrify An	NEVI	Rochelle	Ogle	41.93562	-89.0335	556b2999-	-89.0335	41.93562
11	Love's Travel Stop, Store #746	Gas Stations			6	Awarded (L Love's Trav	NEVI	Decatur	Macon	39.89249	-89.0028	8edeb679-	-89.0028	39.89249
12	Kohl's	Big Retail			6	Awarded (L EVgo Serv	NEVI	Mt Vernon	Jefferson	38.30839	-88.9619	329d7445-	-88.9619	38.30839
13	Love's Travel Stop, Store #292	Gas Stations			6	Awarded (L Love's Trav	NEVI	Dwight	Grundy	41.11404	-88.4152	6996e336-	-88.4152	41.11404
14	Red Roof Inn	Hotels			4	Awarded (L Francis En	NEVI	No Aurora	Kane	41.79478	-88.329	476d563d-	-88.329	41.79478
15	The PRIDE of Elgin BP	Gas Stations			4	Awarded (L BP Product	NEVI	Elgin	Kane	42.07448	-88.2909	3c26614b-	-88.2909	42.07448
16	Best Western Plus	Hotels			4	Awarded (L Francis En	NEVI	Arcola	Douglas	39.67897	-88.2861	aaaaf019-	-88.2861	39.67897
17	Microtel Inn by Wyndham	Hotels			4	Awarded (L Universal E	NEVI	Champaign	Champaign	40.15911	-88.2724	84735e89-	-88.2724	40.15911
18	Taco Bell	Restaurant			4	Awarded (L Francis En	NEVI	Joliet	Will	41.51953	-88.125	ac610928-	-88.125	41.51953
19	Bank of America	Other Businesses			6	Awarded (L Electrify An	NEVI	Bolingbroo	Will	41.69061	-88.0704	aa8acec7-	-88.0704	41.69061
20	Meijer	Big Retail			4	Awarded (L Meijer Stor	NEVI	Rolling Me	Cook	42.04791	-87.9963	d727f612-	-87.9963	42.04791
21	Meyer Oil Co.	Gas Stations			4	Awarded (L The Philli	NEVI	Casey	Clark	39.31661	-87.9853	fa4dec6c-	-87.9853	39.31661
22	BP	Gas Stations			4	Awarded (L BP Product	NEVI	Westchestr	Cook	41.8676	-87.8822	765bf2d1-	-87.8822	41.8676
23	Gas N Wash	Gas Stations			4	Awarded (L BP Product	NEVI	Stickney	Cook	41.82264	-87.7442	cbe74c47-	-87.7442	41.82264
24	Country Inn & Suites	Hotels			4	Awarded (L Francis En	NEVI	Rock Falls	Whiteside	41.7613	-89.6906	9fb1f131-a	-89.6906	41.7613
25	Love's Travel Stop, Store #384	Gas Stations			6	Awarded (L Love's Trav	NEVI	Greenville	Bond	38.8742	-89.3875	fea3cfe4-a	-89.3875	38.8742
26	Love's Travel Stop, Store #351	Gas Stations			6	Awarded (L Love's Trav	NEVI	Utica	LaSalle	41.3697	-89.0097	6fb04e75-t	-89.0097	41.3697
27	Love's Travel Stop, Store #803	Gas Stations			6	Awarded (L Love's Trav	NEVI	Marion	Williamson	37.7457	-88.9493	77310a65-	-88.9493	37.7457
28	Miles Brothers Food	Small Retail			4	Awarded (L Francis En	NEVI	Vienna	Johnson	37.41737	-88.8756	867a8cac-	-88.8756	37.41737
29	Love's Travel Stop, Store #685	Gas Stations			6	Awarded (L Love's Trav	NEVI	Knoxville	Knox	40.9184	-90.2938	c5c71de0-	-90.2938	40.9184
30	Pilgrim Baptist Church of South Chicago	Other			8	Awarded (L EV Clean C	CEJA/VW	Chicago	Cook	41.72992	-87.5453	0236563b-	-87.5453	41.72992
31	Olive Harvey College South Chicago	Government	10			Awarded (L Kennedy-Ki	CEJA/VW	Chicago	Cook	41.72798	-87.5491	f6cd3be1-e	-87.5491	41.72798
32	Menards-Crestwood	Big Retail			8	Awarded (L Kerry Farm	CEJA/VW	Dolton	Cook	41.62405	-87.5821	4901ac18-	-87.5821	41.62405
33	Thorntons	Gas Stations			4	Awarded (L BP Product	CEJA/VW	South Holl	Cook	41.60029	-87.5889	6e58a599-	-87.5889	41.60029
34	Olive-Harvey College	Government	10			Awarded (L Kennedy-Ki	CEJA/VW	Chicago	Cook	41.70985	-87.5893	26ecf872-f	-87.5893	41.70985
35	Park 1 Chicago - 525 S Wabash Ave	Other Busir	10			Awarded (L First Ameri	CEJA/VW	Chicago	Cook	41.87504	-87.6256	3abf68d2-f	-87.6256	41.87504
36	Park 1 Chicago - 601 S Dearborn St	Other Busir	10			Awarded (L First Ameri	CEJA/VW	Chicago	Cook	41.87428	-87.6289	8c1151ef-e	-87.6289	41.87428
37	Modular Manufacture-Wentworth	Other Busir	10			Awarded (L Steer-Liber	CEJA/VW	Chicago	Cook	41.74267	-87.6304	846cc64b-	-87.6304	41.74267
38	Amoco	Gas Stations			6	Awarded (L BP Product	NEVI	Chicago	Cook	41.81611	-87.6315	4d4cf0c3-e	-87.6315	41.81611
39	Citgo	Gas Stations			4	Awarded (L Universal E	CEJA/VW	Chicago	Cook	41.79394	-87.6321	0a5dfbcd-1	-87.6321	41.79394
40	Another Chance Church - Religious Organization	Other			8	Awarded (L EV Clean C	CEJA/VW	Chicago	Cook	41.72021	-87.6325	44d77dae-	-87.6325	41.72021
41	150 W Roosevelt Rd	Small Reta	10			Awarded (L HionEV	CEJA/VW	Chicago	Cook	41.86886	-87.6326	09201b18-	-87.6326	41.86886
42	Modular Manufacture-Stewart	Other Busir	10			Awarded (L Steer-Liber	CEJA/VW	Chicago	Cook	41.74319	-87.6345	c6847f01-f	-87.6345	41.74319
43	Menards-Homewood	Big Retail			4	Awarded (L EV Energy	CEJA/VW	Homewood	Cook	41.57099	-87.6346	f2613fb8-9	-87.6346	41.57099
44	Kennedy-King College	Government	20			Awarded (L Kennedy-Ki	CEJA/VW	Chicago	Cook	41.7783	-87.6439	4153bac7-	-87.6439	41.7783
45	Project One - ParkOne, Inc. Lots	Other Busir	10			Awarded (L First Ameri	CEJA/VW	Chicago	Cook	41.88107	-87.6447	51509d9d-	-87.6447	41.88107
46	BP	Gas Stations			4	Awarded (L BP Product	CEJA/VW	Chicago	Cook	41.95427	-87.6509	4f98fb08-4	-87.6509	41.95427
47	2400 N Sheffield Ave Parking	Government			8	Awarded (L Blink Char	CEJA/VW	Chicago	Cook	41.92586	-87.6541	8f37aade-e	-87.6541	41.92586
48	Hazel Crest Metra Station	Government	10			Awarded (L Southland	CEJA/VW	Hazelcrest	Cook	41.5815	-87.6588	b83e2f41-f	-87.6588	41.5815
49	2032 N Clybourn Ave	Other Busir	10			Awarded (L Powerport	CEJA/VW	Chicago	Cook	41.91796	-87.6605	662758d5-	-87.6605	41.91796
50	Taco Bell	Restaurant			4	Awarded (L Francis En	NEVI	Calumet P	Cook	41.66127	-87.6612	8ab2e211-	-87.6612	41.66127
51	Third Baptist Church	Other			8	Awarded (L EV Clean C	CEJA/VW	Chicago	Cook	41.72081	-87.6622	d97da45e-	-87.6622	41.72081
52	Hyatt Place Chicago Wicker Park	Hotels			4	Awarded (L Nediya Inc	CEJA/VW	Chicago	Cook	41.9104	-87.6674	d7c432ef-7	-87.6674	41.9104

106 Kankakee School District #111 - Kankakee Junior High	Governmenter	10	Awarded (L Powerport CEJA/VW	Kankakee	Kankakee	41.11485	-87.8323	acd140a0-	-87.8323	41.11485
107 Golf Mill Motor Sales, Inc.	Auto Dealers		6 Awarded (L Golf Green CEJA/VW	Niles	Cook	42.05122	-87.8338	ef90a254-4	-87.8338	42.05122
108 Taylor Ford of Manteno	Auto Dealers		4 Online Taylor Ford CEJA/VW	Manteno	Kankakee	41.24478	-87.8343	a1c3c50f-1	-87.8343	41.24478
109 BP	Gas Stations		4 Awarded (L BP Product CEJA/VW	Kankakee	Kankakee	41.11843	-87.8399	95cfe1e0-t	-87.8399	41.11843
110 Golf Mill Chevrolet	Auto Dealers		6 Awarded (L Golf Green CEJA/VW	Niles	Cook	42.05359	-87.8407	91eaabbd0-	-87.8407	42.05359
111 Village of Brookfield Municipal Center	Governmenter	14	Awarded (L Village of B CEJA/VW	Brookfield	Cook	41.82336	-87.8411	313abe3e-	-87.8411	41.82336
112 Park Plaza	Big Retail		4 Awarded (L Blink Charg CEJA/VW	Orland Parl	Cook	41.60215	-87.8417	75f30bc-1	-87.8417	41.60215
113 Adventure Commons	Small Retail		4 Awarded (L Powerport CEJA/VW	Bradley	Kankakee	41.17133	-87.844	aeb18a23-	-87.844	41.17133
114 King Middle School	Governmenter	10	Awarded (L Powerport CEJA/VW	Kankakee	Kankakee	41.11824	-87.8473	8dfa288d-t	-87.8473	41.11824
115 4315 Park Ave	Governmenter	14	Awarded (L Village of B CEJA/VW	Brookfield	Cook	41.81263	-87.8482	f9aba4a6-c	-87.8482	41.81263
116 Taylor Chrysler Dodge, Inc	Auto Dealers		4 Awarded (L Taylor Ford CEJA/VW	Bradley	Kankakee	41.1703	-87.8525	75b17878-	-87.8525	41.1703
117 Menards-Hodgkins	Big Retail		8 Awarded (L Kerry Farm: CEJA/VW	Hodgkins	Cook	41.77916	-87.8595	8ae84c65-	-87.8595	41.77916
118 Thorntons	Gas Stations		4 Awarded (L BP Product CEJA/VW	Bellwood	Cook	41.872	-87.8624	dd2e90da-	-87.8624	41.872
119 Manteno Battery Plant	Other Businesses		8 Awarded (L Powerport CEJA/VW	Manteno	Kankakee	41.24722	-87.8641	458cd83e-	-87.8641	41.24722
120 Love's Travel Stop, Store #395	Gas Stations		6 Awarded (L Love's Trav NEVI	Kankakee	Kankakee	41.07251	-87.8655	3e87ef48-ε	-87.8655	41.07251
121 Jidd Holding/Countryside Mitsubishi	Auto Dealers		8 Awarded (L EVReady E CEJA/VW	Countrysid	Cook	41.78418	-87.8691	419c36f9-7	-87.8691	41.78418
122 Road Ranger	Gas Stations		4 Awarded (L Road Rang CEJA/VW	Bourbonna	Kankakee	41.20534	-87.8706	ada19192-	-87.8706	41.20534
123 IUOE Operating Engineers Local 150	Other Businesses		6 Awarded (L INTERNATI CEJA/VW	Countrysid	Cook	41.7768	-87.8707	0e9bd9ea-	-87.8707	41.7768
124 Menards-Melrose Park	Big Retail		4 Awarded (L EV Energy C CEJA/VW	Melrose Pa	Cook	41.9085	-87.8733	e49c6fd2-ε	-87.8733	41.9085
125 Shell	Gas Stations		4 Awarded (L 3216N, Inc CEJA/VW	Stone Park	Cook	41.90736	-87.8737	a7d0b80-	-87.8737	41.90736
126 BP	Gas Stations		8 Awarded (L BP Product CEJA/VW	Des Plaine: Cook		41.99979	-87.884	faaec43d-2	-87.884	41.99979
127 Kankakee High School	Governmenter	10	Online Powerport CEJA/VW	Kankakee	Kankakee	41.10522	-87.8843	fcdba532-C	-87.8843	41.10522
128 FairBridge Inn Express Melrose Park	Hotels		4 Awarded (L Universal E CEJA/VW	Melrose Pa	Cook	41.9079	-87.8844	c2e33b8a-	-87.8844	41.9079
129 Hyatt Place Rosemont	Hotels		8 Awarded (L G.F.C.S, LL CEJA/VW	Rosemont	Cook	42.00234	-87.8854	1dc094ad-	-87.8854	42.00234
130 1529 Rand Rd	Auto Deale	10	8 Awarded (L EVReady E CEJA/VW	Des Plaine: Cook		42.04731	-87.8862	089a69e3-	-87.8862	42.04731
131 2170 Mannheim Rd	Gas Stations		8 Awarded (L BP Product CEJA/VW	Des Plaine: Cook		42.01259	-87.8883	1425b7b2-	-87.8883	42.01259
132 Jidd Holding/Jidd Motors	Auto Dealers		8 Awarded (L EVReady E CEJA/VW	Des Plaine: Cook		42.0502	-87.8925	f2b31a41-t	-87.8925	42.0502
133 Jidd Holding/Jidd Motors	Auto Dealers		8 Awarded (L EVReady E CEJA/VW	Des Plaine: Cook		42.05619	-87.9035	96f75109-f	-87.9035	42.05619
134 811 E Grand Ave	Hotels		4 Awarded (L Universal E CEJA/VW	Bensenville DuPage		41.93174	-87.9245	adf8f916-e	-87.9245	41.93174
135 777 E Grand Ave	Hotels		4 Awarded (L Universal E CEJA/VW	Bensenville DuPage		41.93189	-87.9253	51a864fe-ε	-87.9253	41.93189
136 Menards-Mt Prospect	Big Retail		4 Awarded (L EV Energy C CEJA/VW	Mt Prospec	Cook	42.07209	-87.9262	6f58fd8-d	-87.9262	42.07209
137 The Edge Ice Arena	Governmenter	10	4 Awarded (L Village of B CEJA/VW	Bensenville DuPage		41.9466	-87.9276	4049cd99-	-87.9276	41.9466
138 Arco Gas Station	Gas Stations		4 Awarded (L M Sons CEJA/VW	Wheeling	Cook	42.13888	-87.9363	95e0667b-	-87.9363	42.13888
139 York Center Plaza	Big Retail		6 Awarded (L Electrify An NEVI	Elmhurst	DuPage	41.91687	-87.9391	2aabf2c8-C	-87.9391	41.91687
140 Thorntons	Gas Stations		4 Online BP Product CEJA/VW	Elk Grove V DuPage		41.99306	-87.9404	82a98c4e-	-87.9404	41.99306
141 Four Points Sheraton Mount Prospect	Hotels		4 Awarded (L Universal E CEJA/VW	Mt Prospec	Cook	42.02526	-87.941	5fdee296-ε	-87.941	42.02526
142 Bensenville Municipal Center	Governmenter	10	4 Awarded (L Village of B CEJA/VW	Bensenville DuPage		41.95633	-87.9414	a7780743-	-87.9414	41.95633
143 TA Travel Center	Gas Stations		8 Awarded (L BP Product CEJA/VW	Zion	Lake	42.48574	-87.9511	97f90f6c-4	-87.9511	42.48574
144 1000 Drury Ln	Hotels		4 Awarded (L Universal E CEJA/VW	Oakbrook1 DuPage		41.86019	-87.9513	ee80ebdf-ε	-87.9513	41.86019
145 12294 Archer Ave	Other Busli	10	Online Powerport CEJA/VW	Lemont	Cook	41.67675	-87.9526	f0381420-t	-87.9526	41.67675
146 Oakbrook Center	Big Retail		8 Awarded (L Rivian CEJA/VW	Oak Brook	DuPage	41.85157	-87.9529	401e9832-	-87.9529	41.85157
147 Shell	Gas Stations		4 Awarded (L 3216N, Inc CEJA/VW	Elk Grove V Cook		42.02207	-87.9593	093ed620-	-87.9593	42.02207
148 Pilot Travel Center	Gas Stations		4 Awarded (L Pilot Travel CEJA/VW	Elk Grove V DuPage		41.98804	-87.9602	f53cc142-2	-87.9602	41.98804
149 Menards-Gurnee	Big Retail		4 Awarded (L EV Energy C CEJA/VW	Gurnee	Lake	42.38341	-87.9604	244d7b75-	-87.9604	42.38341
150 1809 N Milwaukee Ave	Hotels		4 Awarded (L Universal E CEJA/VW	Libertyville Lake		42.30681	-87.9618	0a0771d1-	-87.9618	42.30681
151 Lively Liquor	Small Retail		4 Awarded (L Universal E CEJA/VW	Elk Grove V Cook		42.02647	-87.9681	3cc382fe-ε	-87.9681	42.02647
152 Marathon Gas Station	Gas Stations		4 Awarded (L M Sons CEJA/VW	Vernon Hill Lake		42.22209	-87.9686	43df8f2b-e	-87.9686	42.22209
153 Mariano's	Big Retail		4 Awarded (L Shiner Man CEJA/VW	Gurnee	Lake	42.38344	-87.9708	a764c466-	-87.9708	42.38344
154 Beans & Barley Brews	Small Retail		4 Awarded (L Powerport CEJA/VW	Ashkum	Iroquois	40.88433	-87.9714	28734ca7-d	-87.9714	40.88433
155 The PRIDE of Villa Park - Mobil	Gas Stations		4 Awarded (L The Pride S CEJA/VW	Villa Park	DuPage	41.90509	-87.9826	ed5ce3a3-d	-87.9826	41.90509
156 Days Inn & Suites by Wyndham Casey	Hotels		4 Awarded (L Universal E CEJA/VW	Casey	Clark	39.31638	-87.9869	8e158ad8-d	-87.9869	39.31638
157 Exxon	Gas Stations		4 Awarded (L Red E Char CEJA/VW	Villa Park	DuPage	41.89014	-87.9884	cacd3eff-8	-87.9884	41.89014
158 862 W Dundee Rd	Big Retail		4 Awarded (L Blink Charg CEJA/VW	Arlington H Cook		42.14006	-87.9939	da16c2eb-d	-87.9939	42.14006

159 Super 8	Hotels	4	Awarded (L Francis En NEVI	Gilman	Iroquois	40.75143	-87.9959	2bd047fd-e	-87.9959	40.75143
160 Super 8 by Wyndham Gilman	Hotels	4	Awarded (L Universal E CEJA/VW	Gilman	Iroquois	40.75145	-87.9959	2bfd6b9d-2	-87.9959	40.75145
161 Road Ranger	Gas Stations	4	Awarded (L Road Rang CEJA/VW	Grayville	White	38.24023	-87.9995	ad8f1358-f	-87.9995	38.24023
162 Thorntons	Gas Stations	4	Awarded (L BP Product CEJA/VW	Third Lake	Lake	42.36021	-88.0004	2e6344bf-f	-88.0004	42.36021
163 Pilot Travel Center	Gas Stations	4	Online Pilot Travel CEJA/VW	Gilman	Iroquois	40.75077	-88.0014	b2e0785c-	-88.0014	40.75077
164 O E Park St	Government	4	Awarded (L Village of M CEJA/VW	Mundelein	Lake	42.27134	-88.0031	d4cdb809-	-88.0031	42.27134
165 Village of Mundelein Parking Lot	Government	4	Awarded (L Village of M CEJA/VW	Mundelein	Lake	42.27284	-88.0032	fa6c8028-c	-88.0032	42.27284
166 2061 Shell Dr	Hotels	4	Awarded (L Universal E CEJA/VW	Libertyville	Lake	42.30465	-88.0032	01b75f90-e	-88.0032	42.30465
167 1200 N Frontage Rd	Hotels	4	Awarded (L Universal E CEJA/VW	Palatine	Cook	42.13138	-88.0059	ad0ce60d-d	-88.0059	42.13138
168 Thorntons	Gas Stations	4	Online BP Product CEJA/VW	Addison	DuPage	41.94148	-88.0097	82f55006-c	-88.0097	41.94148
169 Menards-Long Grove	Big Retail	4	Awarded (L EV Energy C CEJA/VW	Long Grove	Lake	42.15542	-88.0247	361cd245-	-88.0247	42.15542
170 Thorntons	Gas Stations	4	Awarded (L BP Product CEJA/VW	Lombard	DuPage	41.9037	-88.0307	b0b60f00-f	-88.0307	41.9037
171 530 W North Ave	Hotels	4	Awarded (L Universal E CEJA/VW	Lombard	DuPage	41.90517	-88.0311	bc37a56e-e	-88.0311	41.90517
172 Casey's	Gas Stations	4	Awarded (L Red E Char CEJA/VW	Bolingbroo	Will	41.72294	-88.0405	791f836c-f	-88.0405	41.72294
173 Thorntons	Gas Stations	4	Awarded (L BP Product CEJA/VW	Woodridge	DuPage	41.7716	-88.0421	18e68a43-	-88.0421	41.7716
174 Shopping Center	Big Retail	4	Awarded (L Shiner Man CEJA/VW	Mundelein	Lake	42.28249	-88.0447	2a89a7da-	-88.0447	42.28249
175 Arco Gas Station	Gas Stations	4	Awarded (L M Sons CEJA/VW	Addison	DuPage	41.93231	-88.045	d9d18fc9-7	-88.045	41.93231
176 Village of Romeoville	Government	4	Awarded (L Village of R CEJA/VW	Romeoville	Will	41.63757	-88.0501	d0a3d6e4-	-88.0501	41.63757
177 Menards-Glendale Heights	Big Retail	4	Awarded (L EV Energy C CEJA/VW	Glendale H	DuPage	41.9023	-88.0668	1a0e05d3-	-88.0668	41.9023
178 520 S Bolingbrook Dr	Hotels	4	Awarded (L Universal E CEJA/VW	Bolingbroo	Will	41.68105	-88.0671	39259bbe-	-88.0671	41.68105
179 Menards	Big Retail	8	Awarded (L Powerport CEJA/VW	Bolingbroo	Will	41.70469	-88.0671	a8f70518-t	-88.0671	41.70469
180 Thorntons	Gas Stations	4	Awarded (L BP Product CEJA/VW	Round Lak	Lake	42.3576	-88.0686	740f3bc9-f	-88.0686	42.3576
181 Thorntons	Gas Stations	6	Awarded (L BP Product CEJA/VW	Joliet	Will	41.53205	-88.0719	a40222d5-	-88.0719	41.53205
182 BP	Gas Stations	4	Awarded (L BP Product CEJA/VW	Glen Ellyn	DuPage	41.85897	-88.0759	1b575501-	-88.0759	41.85897
183 1201-1283 Rand Rd	Small Retail	4	Awarded (L Blink Char CEJA/VW	Lake Zurich	Lake	42.17671	-88.0762	31f0e645-f	-88.0762	42.17671
184 Thorntons	Gas Stations	6	Awarded (L BP Product CEJA/VW	Round Lak	Lake	42.37943	-88.0782	0e9e8e3b-	-88.0782	42.37943
185 Nowell Park Recreation Center	Government	4	Online Veterans E CEJA/VW	Joliet	Will	41.50283	-88.0786	7cf5366c-e	-88.0786	41.50283
186 Suburban Plaza	Big Retail	4	Awarded (L Blink Char CEJA/VW	Schaumbur	Cook	42.02256	-88.0794	4031fbb9-f	-88.0794	42.02256
187 Pilot Travel Center	Gas Stations	4	Awarded (L Pilot Travel CEJA/VW	Joliet	Will	41.48016	-88.0795	09beffa1-1	-88.0795	41.48016
188 Will County Parking Lot	Government	4	Awarded (L Will County CEJA/VW	Joliet	Will	41.52464	-88.0808	e3074dda-	-88.0808	41.52464
189 Will County Office Building	Government	4	Awarded (L Will County CEJA/VW	Joliet	Will	41.53074	-88.0811	97f71a4d-f	-88.0811	41.53074
190 Thorntons	Gas Stations	6	Awarded (L BP Product CEJA/VW	Romeoville	Will	41.64085	-88.0814	304929c9-	-88.0814	41.64085
191 Bombay Chopsticks by India House	Restaurant	4	Awarded (L Universal E CEJA/VW	Hoffman E	Cook	42.04774	-88.0975	bf156219-c	-88.0975	42.04774
192 Clarke Mosquito Control Products, Inc	Small Retail	8	Awarded (L Clarke Mos CEJA/VW	Roselle	DuPage	41.98573	-88.101	451e5758-	-88.101	41.98573
193 Village of Romeoville	Government	4	Awarded (L Village of R CEJA/VW	Romeoville	Will	41.64226	-88.1133	c1cee4ad-d	-88.1133	41.64226
194 531 Roosevelt Rd	Other Businesses	4	Awarded (L Kerry Farm CEJA/VW	Wheaton	DuPage	41.85885	-88.1146	8b723c52-	-88.1146	41.85885
195 Menards-Crest Hill	Big Retail	4	Awarded (L EV Energy C CEJA/VW	Crest Hill	Will	41.56846	-88.1189	ed763688-	-88.1189	41.56846
196 Exxon/Pride Stores	Gas Stations	4	Awarded (L The Pride S CEJA/VW	Wheaton	DuPage	41.88829	-88.122	75882a0d-	-88.122	41.88829
197 Thorntons	Gas Stations	6	Awarded (L BP Product CEJA/VW	Bolingbroo	Will	41.66301	-88.1261	fed01251-7	-88.1261	41.66301
198 Marathon	Gas Stations	4	Awarded (L M Sons CEJA/VW	Barrington	Lake	42.15512	-88.1279	559b2041-	-88.1279	42.15512
199 Rocky Patel Cigar Lounge HP	Small Retail	4	Awarded (L Universal E CEJA/VW	Hanover P	DuPage	41.97691	-88.1291	6e2733c1-	-88.1291	41.97691
200 1837 Centre Point Cir	Hotels	4	Awarded (L Universal E CEJA/VW	Naperville	DuPage	41.8051	-88.1316	7e7a1419-d	-88.1316	41.8051
201 2500 Hassell Rd	Hotels	4	Awarded (L Universal E CEJA/VW	Hoffman E	Cook	42.06316	-88.1418	fe9f1691-9	-88.1418	42.06316
202 Menards-Hanover Park	Big Retail	4	Awarded (L EV Energy C CEJA/VW	Hanover P	Cook	42.00661	-88.1425	685aab1a-	-88.1425	42.00661
203 Menards-Joliet	Big Retail	4	Awarded (L EV Energy C CEJA/VW	Joliet	Will	41.51996	-88.1453	54482271-	-88.1453	41.51996
204 2750 Greenspoint Pkwy	Hotels	4	Awarded (L Universal E CEJA/VW	Hoffman E	Cook	42.06299	-88.1466	5bcc2cf-9	-88.1466	42.06299
205 Thorntons	Gas Stations	4	Online BP Product CEJA/VW	Joliet	Will	41.52153	-88.1499	6b75ce74-	-88.1499	41.52153
206 Inwood Athletic Club	Government	8	Online Veterans E CEJA/VW	Joliet	Will	41.52099	-88.1541	bd86d6d2-	-88.1541	41.52099
207 Thorntons	Gas Stations	4	Awarded (L BP Product CEJA/VW	Volo	Lake	42.32553	-88.1638	ecc33698-f	-88.1638	42.32553
208 28 Roosevelt Rd	Other Businesses	4	Awarded (L Kerry Farm CEJA/VW	West Chic	DuPage	41.85911	-88.1835	e056f389-f	-88.1835	41.85911
209 BP	Gas Stations	4	Awarded (L Lanman O CEJA/VW	Charleston	Cotes	39.48405	-88.1844	fed6b9a7-2	-88.1844	39.48405
210 Thorntons	Gas Stations	4	Awarded (L BP Product CEJA/VW	Naperville	DuPage	41.7792	-88.1851	558c5d31-	-88.1851	41.7792
211 Jidd Holding/Maserati of Naperville	Auto Dealers	8	Awarded (L EVReady E CEJA/VW	Naperville	DuPage	41.77271	-88.1856	48ad6194-	-88.1856	41.77271

212 23801 W Bluff Rd	Gas Stations	4	Awarded (L Love's Trav	CEJA/VW	Channahor Will	41.43433	-88.1894	ea681c96-	-88.1894	41.43433
213 BP	Gas Stations	4	Awarded (L Red E Char	CEJA/VW	Shorewood Will	41.52222	-88.1914	56b7c8a9-	-88.1914	41.52222
214 Thorntons	Gas Stations	4	Online BP Product	CEJA/VW	West Chicε DuPage	41.86334	-88.1955	eb4da90f-ε	-88.1955	41.86334
215 IUOE Operating Engineers Local 150	Other Businesses	4	Awarded (L INTERNATI	CEJA/VW	Lakemoor Lake	42.32816	-88.1956	02447db1-	-88.1956	42.32816
216 Menards	Big Retail	8	Awarded (L Powerport	CEJA/VW	Naperville DuPage	41.7623	-88.1978	85a7062a-	-88.1978	41.7623
217 1831 W Diehl Rd	Hotels	4	Awarded (L Universal E	CEJA/VW	Naperville DuPage	41.80167	-88.2074	69e0be10-	-88.2074	41.80167
218 1905 Franciscan Way	Gas Stations	4	Awarded (L BP Product	CEJA/VW	West Chicε DuPage	41.91644	-88.2097	191c55ad-	-88.2097	41.91644
219 Thorntons	Gas Stations	4	Online BP Product	CEJA/VW	Mchenry McHenry	42.34268	-88.2388	fb0f951a-4	-88.2388	42.34268
220 Thorntons	Gas Stations	6	Awarded (L BP Product	CEJA/VW	Aurora DuPage	41.74118	-88.2463	9a609b22-	-88.2463	41.74118
221 1811 Moreland Blvd	Hotels	4	Awarded (L Universal E	CEJA/VW	Champaign Champaign	40.13637	-88.2515	f3d21ea7-7	-88.2515	40.13637
222 1807 Moreland Blvd	Hotels	4	Awarded (L Universal E	CEJA/VW	Champaign Champaign	40.13577	-88.2517	1f238311-4	-88.2517	40.13577
223 1917 Moreland Blvd	Hotels	4	Awarded (L Universal E	CEJA/VW	Champaign Champaign	40.1391	-88.2518	a2bc4f83-ε	-88.2518	40.1391
224 516 W Marketview Dr	Hotels	4	Awarded (L Universal E	CEJA/VW	Champaign Champaign	40.13817	-88.2522	734a230f-ε	-88.2522	40.13817
225 Menards-Champaign	Big Retail	4	Awarded (L EV Energy C	CEJA/VW	Champaign Champaign	40.14415	-88.2527	2d92c852-	-88.2527	40.14415
226 602 W Marketview Dr	Hotels	4	Awarded (L Universal E	CEJA/VW	Champaign Champaign	40.13797	-88.2529	8725af26-ε	-88.2529	40.13797
227 695 Barrington Ave	Gas Stations	4	Awarded (L BP Product	CEJA/VW	Carpenters Kane	42.10484	-88.2588	5e15e6d0-	-88.2588	42.10484
228 Americas Best Value Inn Champaign	Hotels	4	Online Universal E	CEJA/VW	Champaign Champaign	40.13307	-88.2618	8d3d244b-	-88.2618	40.13307
229 Dundee-Crown High School	Government	10	Awarded (L Community	CEJA/VW	Carpenters Kane	42.13386	-88.2698	e884e917-	-88.2698	42.13386
230 Pilot Travel Center	Gas Stations	4	Awarded (L Pilot Travel	CEJA/VW	Minooka Grundy	41.4606	-88.2722	a82f75fe-d	-88.2722	41.4606
231 BP	Gas Stations	4	Awarded (L Lanman OI	CEJA/VW	Tuscola Douglas	39.79201	-88.2727	cca10670-i	-88.2727	39.79201
232 Carpentersville Middle School	Government	10	Awarded (L Community	CEJA/VW	Carpenters Kane	42.10783	-88.274	c958e068-	-88.274	42.10783
233 PRIDE Gas Station	Gas Stations	4	Awarded (L The Pride S	CEJA/VW	St Charles Kane	41.92107	-88.2749	9cacc8cd-f	-88.2749	41.92107
234 101 S Mattis Ave	Gas Stations	4	Awarded (L BP Product	CEJA/VW	Champaign Champaign	40.11613	-88.2773	68c5cdbc-f	-88.2773	40.11613
235 Thorntons	Gas Stations	4	Online BP Product	CEJA/VW	Aurora Kane	41.8071	-88.2809	4e890c66-	-88.2809	41.8071
236 1555 S Illinois Rte 31	Hotels	4	Awarded (L Universal E	CEJA/VW	Mchenry McHenry	42.30745	-88.2833	9eed835b-b	-88.2833	42.30745
237 Menards-Montgomery	Big Retail	4	Awarded (L EV Energy C	CEJA/VW	Montgomei Kendall	41.71908	-88.285	0db01b82-	-88.285	41.71908
238 Thorntons	Gas Stations	4	Online BP Product	CEJA/VW	Crystal Lak McHenry	42.21507	-88.2875	a5534b39-	-88.2875	42.21507
239 Sonesta Select Chicago Elgin West Dundee	Hotels	4	Awarded (L Universal E	CEJA/VW	West Dund Kane	42.07472	-88.2886	7a1be9b4-	-88.2886	42.07472
240 Clarke Mosquito Control Products, Inc	Small Retail	8	Awarded (L Clarke Mos	CEJA/VW	St Charles Kane	41.91151	-88.2895	f7fb3a4d-c	-88.2895	41.91151
241 Menards-Crystal Lake	Big Retail	4	Awarded (L EV Energy C	CEJA/VW	Crystal Lak McHenry	42.22848	-88.2922	d3c1a451-	-88.2922	42.22848
242 Super 8 by Wyndham St. Charles	Hotels	4	Awarded (L Universal E	CEJA/VW	St Charles Kane	41.9187	-88.2957	eee0aadf-ε	-88.2957	41.9187
243 BP	Gas Stations	4	Awarded (L Lanman OI	CEJA/VW	Mattoon Coles	39.48349	-88.3036	f8b7a2ab-f	-88.3036	39.48349
244 City Of Batavia	Government	4	Awarded (L City of Batε	CEJA/VW	Batavia Kane	41.8483	-88.3079	a01deb89-i	-88.3079	41.8483
245 Casey's	Gas Stations	4	Awarded (L Red E Char	CEJA/VW	Arcola Douglas	39.68484	-88.3096	8fd4d73e-f	-88.3096	39.68484
246 151 S McLean Blvd	Other Busii	10	Awarded (L Powerport	CEJA/VW	So Elgin Kane	41.99445	-88.3151	1401e48d-	-88.3151	41.99445
247 Mobil	Gas Stations	4	Awarded (L Universal E	CEJA/VW	No Aurora Kane	41.79194	-88.3223	46e70e85-	-88.3223	41.79194
248 308 S Lincolnway St	Hotels	4	Awarded (L Universal E	CEJA/VW	No Aurora Kane	41.79316	-88.3266	757eed46-	-88.3266	41.79316
249 1309 Fort Worth Way	Government	10	Awarded (L City of Mat	CEJA/VW	Mattoon Coles	39.48207	-88.329	444544a8-	-88.329	39.48207
250 201 Smoke Tree Plz	Hotels	4	Awarded (L Universal E	CEJA/VW	No Aurora Kane	41.79479	-88.329	21d3e1e8-	-88.329	41.79479
251 Thorntons	Gas Stations	6	Online BP Product	CEJA/VW	Lake In The McHenry	42.17513	-88.3301	fe96c08a-ε	-88.3301	42.17513
252 Batavia School District 101	Government	4	Awarded (L City of Batε	CEJA/VW	Batavia Kane	41.84821	-88.3306	c0d43bf2-ε	-88.3306	41.84821
253 Emerald Acres Sports Connection	Government	4	Awarded (L City of Mat	CEJA/VW	Mattoon Coles	39.48111	-88.3315	3a53f32b-c	-88.3315	39.48111
254 Emerald Acres Sports Connection	Government	4	Awarded (L City of Mat	CEJA/VW	Mattoon Coles	39.48106	-88.3328	a0e620f5-t	-88.3328	39.48106
255 Country Inn & Suites by Radisson, Elgin, IL	Hotels	10	Awarded (L Universal E	CEJA/VW	Elgin Kane	42.08321	-88.3329	cd2d2fc0-ε	-88.3329	42.08321
256 Menards-Batavia	Big Retail	4	Awarded (L EV Energy C	CEJA/VW	Batavia Kane	41.85642	-88.3392	b46c4db5-i	-88.3392	41.85642
257 2601 Bunker Hill Dr	Government	6	Awarded (L Community	CEJA/VW	Algonquin McHenry	42.16623	-88.341	96134828-	-88.341	42.16623
258 Community Unit School District 300	Government	10	Awarded (L Community	CEJA/VW	Algonquin McHenry	42.16201	-88.3421	aa32d452-	-88.3421	42.16201
259 TA Travel Center	Gas Stations	8	Awarded (L BP Product	CEJA/VW	Morris Grundy	41.39171	-88.4203	959c3f39-f	-88.4203	41.39171
260 3801 N Division St	Gas Stations	4	Awarded (L Pilot Travel	CEJA/VW	Morris Grundy	41.39521	-88.4211	c84583cf-ε	-88.4211	41.39521
261 Days Inn & Wyndham of Morris	Hotels	4	Awarded (L Universal E	CEJA/VW	Morris Grundy	41.39347	-88.4237	474151ac-f	-88.4237	41.39347
262 Menards	Big Retail	8	Awarded (L Powerport	CEJA/VW	Morris Grundy	41.38857	-88.4281	f4d959fb-b	-88.4281	41.38857
263 Thorntons	Gas Stations	6	Online BP Product	CEJA/VW	Huntley McHenry	42.15444	-88.4335	3f1c0261-ε	-88.4335	42.15444
264 Menards	Big Retail	8	Awarded (L Powerport	CEJA/VW	Yorkville Kendall	41.6649	-88.4397	3b3e523e-	-88.4397	41.6649

265	Historic Court House	Government	10	Awarded (L Kendall Co CEJA/VW	Yorkville	Kendall	41.64033	-88.4482	73eba31a-	-88.4482	41.64033
266	15 IL-47/PowerPort	Gas Stations		8 Awarded (L Powerport CEJA/VW	Pingree Grc	Kane	42.08803	-88.4574	f260b34b-t	-88.4574	42.08803
267	Kendall County Courthouse	Government	10	Awarded (L Kendall Co CEJA/VW	Yorkville	Kendall	41.65857	-88.4629	cfbb1346-c	-88.4629	41.65857
268	Shell/PowerPort	Gas Stations		8 Awarded (L Powerport CEJA/VW	Lily Lake	Kane	41.94003	-88.4789	fb186f16-5	-88.4789	41.94003
269	Hampshire High School	Government	10	Awarded (L Community CEJA/VW	Hampshire	Kane	42.12148	-88.498	5935e6a7-7	-88.498	42.12148
270	Gjovik Ford	Auto Dealers		4 Online Gjovik Ford CEJA/VW	Plano	Kendall	41.66171	-88.5063	664815b3-	-88.5063	41.66171
272	19N681 US-20	Gas Stations		8 Awarded (L BP Product CEJA/VW	Hampshire	Kane	42.14517	-88.5097	e1e62fbf-2	-88.5097	42.14517
273	201 Loves Crossing	Gas Stations		4 Awarded (L Road Rang CEJA/VW	Hampshire	Kane	42.14943	-88.5116	96cf1674-7	-88.5116	42.14943
274	Pilot Travel Center	Gas Stations		4 Awarded (L Love's Trav CEJA/VW	Hampshire	Kane	42.14914	-88.514	d21d9eb0-	-88.514	42.14914
275	TA Travel Center	Gas Stations		4 Awarded (L Pilot Travel CEJA/VW	Effingham	Effingham	39.14919	-88.5306	f5525d75-7	-88.5306	39.14919
276	Petro Travel Center	Gas Stations		8 Awarded (L BP Product CEJA/VW	Effingham	Effingham	39.13631	-88.5658	69f03b7b-3	-88.5658	39.13631
277	Gjovik Chevrolet Buick GMC	Auto Dealers		8 Awarded (L BP Product CEJA/VW	Effingham	Effingham	39.1197	-88.5722	fdf319af-6t	-88.5722	39.1197
278	Baymont Inn	Hotels		6 Online Gjovik Ford CEJA/VW	Sandwich	Kendall	41.64894	-88.5848	26e7852e-	-88.5848	41.64894
279	Phillips 66	Gas Stations		4 Awarded (L Universal E CEJA/VW	Harvard	McHenry	42.39685	-88.6121	80092ab9-	-88.6121	42.39685
280	Acee's Food and Fuel	Gas Stations		4 Awarded (L GPM Invest CEJA/VW	Edgewood	Effingham	38.92906	-88.6621	a9ec05aa-	-88.6621	38.92906
281	Quality Inn Sycamore - DeKalb	Hotels		4 Awarded (L Red E Char CEJA/VW	Metropolis	Massac	37.16239	-88.6899	eb58e69c-	-88.6899	37.16239
282	Best Western Sycamore	Hotels		4 Awarded (L Universal E CEJA/VW	Sycamore	DeKalb	41.97812	-88.7092	34631a0d-	-88.7092	41.97812
283	417 S Chestnut St	Hotels		4 Awarded (L Universal E CEJA/VW	Sycamore	DeKalb	41.96767	-88.7201	6964bb79-	-88.7201	41.96767
284	Citgo	Gas Stations		4 Online Francis Enr CEJA/VW	Leroy	McLean	40.34327	-88.7615	df62eeb6-ε	-88.7615	40.34327
285	663 N Annie Glidden Rd	Gas Stations		4 Awarded (L Universal E CEJA/VW	Dekalb	DeKalb	41.93065	-88.7704	fff16abd-aε	-88.7704	41.93065
286	575 S Annie Glidden Rd	Hotels		4 Awarded (L Universal E CEJA/VW	Dekalb	DeKalb	41.94134	-88.7735	fea81df0-5	-88.7735	41.94134
287	3041 IL-71	Hotels		4 Awarded (L Universal E CEJA/VW	Dekalb	DeKalb	41.92474	-88.774	d86c91e7-	-88.774	41.92474
288	Red Dog Grill	Gas Stations		4 Awarded (L Road Rang CEJA/VW	Ottawa	LaSalle	41.3792	-88.7766	fd9575ea-ε	-88.7766	41.3792
289	Quality Inn Ottawa near Starved Rock State Park	Restaurant		4 Awarded (L Universal E CEJA/VW	Ottawa	LaSalle	41.34105	-88.7854	456f1d79-	-88.7854	41.34105
290	Super 8 by Wyndham Ottawa Starved Rock	Hotels		4 Online Universal E CEJA/VW	Ottawa	LaSalle	41.37403	-88.8315	90f799fb-1	-88.8315	41.37403
291	2750 Columbus St	Hotels		4 Online Universal E CEJA/VW	Ottawa	LaSalle	41.37392	-88.8325	b3aebd76-	-88.8325	41.37392
292	Kroger	Hotels		4 Awarded (L Universal E CEJA/VW	Ottawa	LaSalle	41.37092	-88.8348	82d83fb6-	-88.8348	41.37092
293	IVCC Ottawa Center	Big Retail		4 Awarded (L Universal E CEJA/VW	Ottawa	LaSalle	41.37033	-88.838	11a1c3ab-1	-88.838	41.37033
294	Phillips 66	Government		4 Awarded (L Universal E CEJA/VW	Ottawa	LaSalle	41.34554	-88.8452	152871a5-	-88.8452	41.34554
295	Dairy Queen Grill & Chill	Gas Stations		4 Awarded (L GPM Invest CEJA/VW	St Elmo	Fayette	39.02363	-88.8489	ece7c008-	-88.8489	39.02363
296	Acee's Food and Fuel	Restaurant		4 Awarded (L Universal E CEJA/VW	Belvidere	Boone	42.27023	-88.8579	54fcdac6-4	-88.8579	42.27023
297	Pilot Travel Center	Gas Stations		4 Awarded (L Red E Char CEJA/VW	Vienna	Johnson	37.41616	-88.8757	69ea00cb-1	-88.8757	37.41616
298	Sleep Inn Decatur I-72	Gas Stations		4 Awarded (L Pilot Travel CEJA/VW	Decatur	Macon	39.90752	-88.8957	783a8e0e-1	-88.8957	39.90752
299	Devin Lakeshore Ampitheater - Decatur Park District	Hotels		4 Awarded (L Universal E CEJA/VW	Decatur	Macon	39.90511	-88.8961	d24771e7-	-88.8961	39.90511
300	330 E Broadway Blvd	Government		4 Awarded (L City of Dec CEJA/VW	Decatur	Macon	39.83495	-88.9194	42069078-	-88.9194	39.83495
301	606 Washington Ave	Government		4 Awarded (L City of Johr CEJA/VW	Johnston C	Williamson	37.81688	-88.9252	e7f8a992-ε	-88.9252	37.81688
302	Americas Best Value Inn Marion, IL	Government		4 Awarded (L City of Johr CEJA/VW	Johnston C	Williamson	37.81725	-88.9263	c765f132-ε	-88.9263	37.81725
303	Econo Lodge	Hotels		4 Awarded (L Universal E CEJA/VW	Marion	Williamson	37.74171	-88.9491	aebb6b54-	-88.9491	37.74171
304	Menards-Mt Vernon	Hotels		4 Awarded (L Universal E CEJA/VW	Marion	Williamson	37.74191	-88.95	9b3155ee-	-88.95	37.74191
305	City of Decatur	Big Retail		4 Awarded (L EV Energy C CEJA/VW	Mt Vernon	Jefferson	38.30177	-88.95	7ce74d67-	-88.95	38.30177
306	Decatur Public Library	Government	10	Awarded (L City of Dec CEJA/VW	Decatur	Macon	39.8453	-88.9523	76894b63-	-88.9523	39.8453
307	Casey's	Government		4 Awarded (L City of Dec CEJA/VW	Decatur	Macon	39.842	-88.9524	cebefd25-c	-88.9524	39.842
308	Casey's	Gas Stations		4 Awarded (L Red E Char CEJA/VW	Marion	Williamson	37.73029	-88.9551	e2270e01-	-88.9551	37.73029
309	Days Inn by Wyndham Mount Vernon	Gas Stations		4 Awarded (L Red E Char CEJA/VW	Loves Park	Winnebago	42.31953	-88.957	c2063200-	-88.957	42.31953
310	TA Travel Center	Hotels		4 Awarded (L Universal E CEJA/VW	Mt Vernon	Jefferson	38.31547	-88.9573	34d97b1c-	-88.9573	38.31547
311	Menards-Marion	Gas Stations		8 Awarded (L BP Product CEJA/VW	Mt Vernon	Jefferson	38.31349	-88.9593	d862a173-	-88.9593	38.31349
312	Pilot Travel Center	Big Retail		4 Awarded (L EV Energy C CEJA/VW	Marion	Williamson	37.74645	-88.9594	c888ab77-1	-88.9594	37.74645
313	IHOP	Gas Stations		4 Awarded (L Pilot Travel CEJA/VW	Mt Vernon	Jefferson	38.3126	-88.961	b82e5a39-	-88.961	38.3126
314	Pilot Travel Center	Small Retail		4 Awarded (L Universal E CEJA/VW	Marion	Williamson	37.74506	-88.9619	171dd2fd-2	-88.9619	37.74506
315	Salem Liquor	Gas Stations		4 Online Pilot Travel CEJA/VW	Marion	Williamson	37.7403	-88.9646	50e672f6-c	-88.9646	37.7403
316	7712 Potawatomi Trail	Small Retail		4 Awarded (L Universal E CEJA/VW	Salem	Marion	38.6249	-88.9646	e7279984-	-88.9646	38.6249
317	Super 8 by Wyndham Rockford	Hotels		4 Awarded (L Universal E CEJA/VW	Rockford	Winnebago	42.27214	-88.966	6b88e599-	-88.966	42.27214
		Hotels		4 Awarded (L Universal E CEJA/VW	Rockford	Winnebago	42.27341	-88.9677	57779e3f-c	-88.9677	42.27341

318 Applebee's Grill + Bar	Restaurant	4	Awarded (L Universal E CEJA/VW	Marion	Williamson	37.74353	-88.9685	4995d738-	-88.9685	37.74353
319 7401 Walton St	Hotels	4	Awarded (L Universal E CEJA/VW	Rockford	Winnebago	42.26843	-88.9722	3394a099-	-88.9722	42.26843
320 Dairy Queen Grill and Chill	Restaurant	4	Awarded (L Universal E CEJA/VW	Loves Park	Winnebago	42.31936	-88.9788	361d11ef-z	-88.9788	42.31936
321 Dairy Queen Grill and Chill	Restaurant	4	Awarded (L Universal E CEJA/VW	Cherry Vall	Winnebago	42.24273	-88.9791	fa15b151-e	-88.9791	42.24273
322 Road Ranger	Gas Stations	4	Awarded (L Road Rang CEJA/VW	Marion	Williamson	37.61947	-88.9861	9ef8ebca-5	-88.9861	37.61947
323 15766 Manchester Rd	Gas Stations	4	Online GPM Invest CEJA/VW	South Belo	Winnebago	42.48991	-88.9891	01b6be27-	-88.9891	42.48991
324 Schnucks Normal	Big Retail	8	Online Rivian CEJA/VW	Normal	McLean	40.53392	-88.9909	571200ff-d	-88.9909	40.53392
325 1600 N Main St	Hotels	4	Awarded (L Universal E CEJA/VW	Normal	McLean	40.53034	-88.9946	80da02b2-	-88.9946	40.53034
326 Fairview Park	Government	4	Awarded (L City of Dec CEJA/VW	Decatur	Macon	39.84485	-88.9966	7d7e4ea3-	-88.9966	39.84485
327 Clarion Pointe Bloomington - Normal near I-55 and University	Hotels	4	Awarded (L Universal E CEJA/VW	Normal	McLean	40.53444	-88.9967	49f27d00-e	-88.9967	40.53444
328 2007 N Main St	Gas Stations	4	Awarded (L Love's Trav CEJA/VW	Normal	McLean	40.54165	-88.998	1332c92d-	-88.998	40.54165
329 13555 Willowbrook Rd	Gas Stations	4	Awarded (L BP Product CEJA/VW	Roscoe	Winnebago	42.45757	-88.9987	2cee08b8-	-88.9987	42.45757
330 16049 Willowbrook Rd	Gas Stations	4	Awarded (L Pilot Travel CEJA/VW	South Belo	Winnebago	42.49413	-88.9988	598583be-	-88.9988	42.49413
331 6070 Gardner St	Gas Stations	4	Awarded (L Road Rang CEJA/VW	South Belo	Winnebago	42.49103	-88.9994	a6797ead-	-88.9994	42.49103
332 3020 E 8th Rd	Gas Stations	4	Awarded (L Love's Trav CEJA/VW	Utica	LaSalle	41.36971	-89.0097	a7528b3c-	-89.0097	41.36971
333 Pilot Travel Center	Gas Stations	4	Awarded (L Pilot Travel CEJA/VW	Bloomingt	McLean	40.48267	-89.0172	ec4ec021-	-89.0172	40.48267
334 Pilot Travel Center	Gas Stations	4	Online Pilot Travel CEJA/VW	Rochelle	Ogle	41.93556	-89.0175	dc0c278e-	-89.0175	41.93556
335 BP/PowerPort	Gas Stator	8	Awarded (L Powerport CEJA/VW	Monroe Ce	Ogle	42.10125	-89.0182	c81ccb07-	-89.0182	42.10125
336 4850 E State St	Hotels	4	Awarded (L Universal E CEJA/VW	Rockford	Winnebago	42.26449	-89.022	713ab51a-	-89.022	42.26449
337 505 Brock Dr	Hotels	4	Awarded (L Universal E CEJA/VW	Bloomingt	McLean	40.48342	-89.0239	84d7e356-	-89.0239	40.48342
338 TA Travel Center	Gas Stations	8	Awarded (L BP Product CEJA/VW	Bloomingt	McLean	40.4879	-89.0263	73504c83-	-89.0263	40.4879
339 Dairy Queen Grill & Chill	Restaurant	4	Awarded (L Universal E CEJA/VW	Rockford	Winnebago	42.31778	-89.0319	6a53adf3-c	-89.0319	42.31778
340 Road Ranger	Gas Stations	4	Awarded (L Road Rang CEJA/VW	Rochelle	Ogle	41.93348	-89.035	487dfbb7-5	-89.035	41.93348
341 Road Ranger	Gas Stations	4	Awarded (L Road Rang CEJA/VW	Minonk	Woodford	40.91293	-89.0535	88a50c2d-	-89.0535	40.91293
342 Dairy Queen Grill and Chill	Restaurant	4	Awarded (L Universal E CEJA/VW	Rockford	Winnebago	42.22306	-89.0712	dd6aa75e-	-89.0712	42.22306
343 Love's Travel Stop, Store #529	Gas Stations	6	Awarded (L Love's Trav NEVI	Oglesby	LaSalle	41.29351	-89.0865	b7e065b2-	-89.0865	41.29351
344 343 Civic Rd	Gas Stations	4	Online Pilot Travel CEJA/VW	LaSalle	LaSalle	41.36913	-89.0979	6f8f9f67-b	-89.0979	41.36913
345 BP Sandoval QuickStop	Gas Stations	4	Awarded (L Universal E CEJA/VW	Sandoval	Marion	38.61592	-89.1148	119d68ed-	-89.1148	38.61592
346 Menards	Big Retail	8	Awarded (L Powerport CEJA/VW	Peru	LaSalle	41.36299	-89.1238	90b3c13b-	-89.1238	41.36299
347 Centralia Motel & Extended Stay	Hotels	4	Awarded (L Universal E CEJA/VW	Centralia	Marion	38.52546	-89.1329	f34dc4b4-f	-89.1329	38.52546
348 Pilot Travel Center	Gas Stations	4	Awarded (L Pilot Travel CEJA/VW	Vandalia	Fayette	38.97086	-89.1359	c28704a2-	-89.1359	38.97086
349 Walker's Bluff Casino Resort	Hotels	4	Awarded (L Egyptian El CEJA/VW	Carterville	Williamson	37.80239	-89.1498	a4821855-	-89.1498	37.80239
350 BP/ Red E	Gas Stations	4	Awarded (L Red E Char CEJA/VW	Dongola	Union	37.36853	-89.1575	b53be4f0-z	-89.1575	37.36853
351 Touch of Nature Outdoor Education Center	Other Businesses	4	Awarded (L Egyptian El CEJA/VW	Makanda	Jackson	37.6277	-89.1583	34868814-	-89.1583	37.6277
352 Triple E Barbeque	Gas Stations	4	Awarded (L Francis Ent NEVI	Ullin	Pulaski	37.27142	-89.1607	e0b81bcd-	-89.1607	37.27142
353 Road Ranger	Gas Stations	4	Awarded (L Road Rang CEJA/VW	McLean	McLean	40.31044	-89.1688	1b6c11c4-	-89.1688	40.31044
354 IHOP	Small Retail	4	Awarded (L Universal E CEJA/VW	Carbondale	Jackson	37.73323	-89.1878	3c59a483-	-89.1878	37.73323
355 Super 8 by Wyndham Carbondale	Hotels	4	Awarded (L Universal E CEJA/VW	Carbondale	Jackson	37.73069	-89.1948	a00b7759-	-89.1948	37.73069
356 Applebee's Grill + Bar	Restaurant	4	Awarded (L Universal E CEJA/VW	Carbondale	Jackson	37.72783	-89.1979	d7a09f57-e	-89.1979	37.72783
357 SIU Department of Chemistry and Biochemistry	Government	4	Awarded (L Egyptian El CEJA/VW	Carbondale	Jackson	37.71314	-89.2174	296e72c5-	-89.2174	37.71314
358 Casey's	Gas Stations	4	Awarded (L Red E Char CEJA/VW	Atlanta	Logan	40.25905	-89.2264	bb9febeb-c	-89.2264	40.25905
359 Airport	Government	4	Awarded (L Egyptian El CEJA/VW	Murphysbo	Jackson	37.7763	-89.2517	60c53b9a-	-89.2517	37.7763
360 Student Parking - SIU Carbondale Transportation Education Center	Government	4	Awarded (L Egyptian El CEJA/VW	Murphysbo	Jackson	37.77534	-89.2523	82be58fe-5	-89.2523	37.77534
361 Student Parking, SIU Carbondale	Governer	10	Awarded (L Egyptian El CEJA/VW	Carbondale	Jackson	37.77273	-89.2524	0b7d7c66-	-89.2524	37.77273
362 Quality Inn & Suites Lincoln near I-55	Hotels	4	Awarded (L Universal E CEJA/VW	Lincoln	Logan	40.1574	-89.4093	62571995-	-89.4093	40.1574
363 Road Ranger	Gas Stations	4	Awarded (L Road Rang CEJA/VW	Princeton	Bureau	41.40294	-89.4685	9bf619f4-c	-89.4685	41.40294
364 Super 8 by Wyndham Princeton	Hotels	4	Online Universal E CEJA/VW	Princeton	Bureau	41.40479	-89.4694	af624f00-8	-89.4694	41.40479
365 Super Stay Inn, Princeton IL	Hotels	4	Online Universal E CEJA/VW	Princeton	Bureau	41.39756	-89.4709	27f9624b-c	-89.4709	41.39756
366 Road Ranger	Gas Stations	4	Awarded (L Road Rang CEJA/VW	Dixon	Lee	41.82272	-89.4751	8991cd3b-	-89.4751	41.82272
367 Economy Inn	Hotels	4	Online Universal E CEJA/VW	Chillicothe	Peoria	40.90305	-89.4935	7986cda8-	-89.4935	40.90305
368 Econo Lodge	Hotels	4	Awarded (L Universal E CEJA/VW	Chillicothe	Peoria	40.90066	-89.4957	7f2d44e0-f	-89.4957	40.90066
369 Phillips 66 Gas Station	Gas Stations	4	Awarded (L Universal E CEJA/VW	East Peoria	Tazewell	40.68386	-89.5122	78967643-	-89.5122	40.68386
370 New Twist	Other Businesses	4	Awarded (L Universal E CEJA/VW	East Peoria	Tazewell	40.62944	-89.5506	f82af6b1-c	-89.5506	40.62944

426	2180 Patricia Ct	Hotels	4	Awarded (L Universal E CEJA/VW	Caseyville	St Clair	38.61204	-90.0459	e541e4f9-e	-90.0459	38.61204		
427	8950 Tucker Dr	Hotels	4	Awarded (L Universal E CEJA/VW	Caseyville	St Clair	38.61027	-90.0472	f8249ffc-4c	-90.0472	38.61027		
428	Motel 6	Hotels	4	Awarded (L Universal E CEJA/VW	Caseyville	St Clair	38.61441	-90.0498	7b834ca4-f	-90.0498	38.61441		
429	Pilot Travel Center	Gas Stations	4	Awarded (L Pilot Travel CEJA/VW	Pontoon Be	Madison	38.76006	-90.0652	52e1abed-f	-90.0652	38.76006		
430	5224 Commerce Pkwy	Hotels	4	Awarded (L Universal E CEJA/VW	Pontoon Be	Madison	38.75174	-90.0714	1c3c425b-f	-90.0714	38.75174		
431	14 Regency Pkwy	Hotels	4	Awarded (L Universal E CEJA/VW	Pontoon Be	Madison	38.745	-90.072	206b04b5-f	-90.072	38.745		
432	Best Western Plus Pontoon Beach	Hotels	4	Awarded (L Universal E CEJA/VW	Pontoon Be	Madison	38.74616	-90.0729	139c5395-f	-90.0729	38.74616		
433	Empire Ink Studio	Small Retail	4	Awarded (L Universal E CEJA/VW	Wood River	Madison	38.86129	-90.0733	09a63bc3-f	-90.0733	38.86129		
434	Super 8 by Wyndham Pontoon Beach IL/St. Louis MO Area	Hotels	4	Awarded (L Universal E CEJA/VW	Pontoon Be	Madison	38.74691	-90.0734	0ac7bde9-f	-90.0734	38.74691		
435	101 Piasa Ln	Gas Stations	4	Awarded (L GPM Invest CEJA/VW	Hartford	Madison	38.81402	-90.0978	88757109-f	-90.0978	38.81402		
436	Pilot Travel Center	Gas Stations	4	Awarded (L Pilot Travel CEJA/VW	Alorton	St Clair	38.57578	-90.099	2d37523c-c	-90.099	38.57578		
437	Bel-Air Motel	Hotels	4	Awarded (L Universal E CEJA/VW	Wood River	Madison	38.85867	-90.1067	0eac0a3f-e	-90.1067	38.85867		
438	Budget Motel - Granite City/St. Louis Area	Hotels	4	Awarded (L Universal E CEJA/VW	Granite Cit	Madison	38.76298	-90.12	56c302be-f	-90.12	38.76298		
439	3236 W Chain of Rocks Rd	Hotels	4	Awarded (L Universal E CEJA/VW	Granite Cit	Madison	38.76259	-90.1212	0c93d16a-f	-90.1212	38.76259		
440	State Street Shopping Center	Small Retail	6	Awarded (L EVgo Servic CEJA/VW	East St Lou	St Clair	38.61495	-90.1262	d90bf888-c	-90.1262	38.61495		
441	1951 Collinsville Rd	Gas Stations	4	Awarded (L Universal E CEJA/VW	Fairmont	St Clair	38.64138	-90.129	be886148-f	-90.129	38.64138		
442	Best Western Premier Alton-St. Louis Area Hotel	Hotels	4	Awarded (L Universal E CEJA/VW	Alton	Madison	38.90344	-90.1309	721cbca8-f	-90.1309	38.90344		
443	Pilot Travel Center	Gas Stations	4	Awarded (L Pilot Travel CEJA/VW	Madison	St Clair	38.65185	-90.1311	b1d2b7c1-f	-90.1311	38.65185		
444	Comfort Inn Alton near I-255	Hotels	4	Awarded (L Universal E CEJA/VW	Alton	Madison	38.90311	-90.1318	ecef65f-e	-90.1318	38.90311		
445	2021 Goose Lake Rd	Other Businesses	4	Awarded (L Kerry Farm: CEJA/VW	Sauget	St Clair	38.56386	-90.1344	f9edda9d-f	-90.1344	38.56386		
446	3220 Chain of Rocks Rd	Hotels	4	Awarded (L Universal E CEJA/VW	Madison	Madison	38.75744	-90.1556	826e6ad0-f	-90.1556	38.75744		
447	112 Warren Dr	Hotels	4	Awarded (L Universal E CEJA/VW	Waterloo	Monroe	38.36803	-90.1579	b2476daf-f	-90.1579	38.36803		
448	Best Western Plus Parkway Hotel	Hotels	4	Awarded (L Universal E CEJA/VW	Alton	Madison	38.91842	-90.1628	85099019-f	-90.1628	38.91842		
449	1800 Homer M Adams Pkwy	Hotels	4	Awarded (L Universal E CEJA/VW	Alton	Madison	38.91881	-90.1639	c87e726a-f	-90.1639	38.91881		
450	Former Gas Station	Gas Stations	4	Awarded (L Red E Char CEJA/VW	Fulton	Whiteside	41.86139	-90.1653	293c440b-f	-90.1653	41.86139		
451	165 Admiral Trost Dr	Hotels	4	Awarded (L Universal E CEJA/VW	Columbia	Monroe	38.44177	-90.2173	56867258-f	-90.2173	38.44177		
452	Pilot Travel Center	Gas Stations	4	Awarded (L Pilot Travel CEJA/VW	Woodhull	Henry	41.18062	-90.338	fa7411e7-c	-90.338	41.18062		
453	Menards-Galesburg	Big Retail	8	Awarded (L Kerry Farm: CEJA/VW	Galesburg	Knox	40.98082	-90.3572	d38d3e93-f	-90.3572	40.98082		
454	MetroLINK-Supermercado	Small Retail	4	Awarded (L MetroLINK CEJA/VW	East Moline	Rock Islanc	41.51629	-90.4424	fc31165c-c	-90.4424	41.51629		
455	MetroLINK- Future Parking Lot	Government	4	Awarded (L MetroLINK CEJA/VW	East Moline	Rock Islanc	41.52031	-90.4581	3204631b-f	-90.4581	41.52031		
456	Best Western Airport Inn	Hotels	4	Awarded (L Universal E CEJA/VW	Moline	Rock Islanc	41.46333	-90.5006	8a54f76c-2	-90.5006	41.46333		
457	MetroLINK	Government	4	Awarded (L MetroLINK CEJA/VW	Moline	Rock Islanc	41.50762	-90.5146	2e643708-f	-90.5146	41.50762		
458	MetroLINK	Government	4	Awarded (L MetroLINK CEJA/VW	Moline	Rock Islanc	41.5088	-90.5152	ebedf07d-f	-90.5152	41.5088		
459	MetroLINK	Government	4	Awarded (L MetroLINK CEJA/VW	Moline	Rock Islanc	41.50576	-90.5198	4a3e80fe-c	-90.5198	41.50576		
460	MetroLINK-Rock Island	Government	4	Awarded (L MetroLINK CEJA/VW	Rock Islanc	Rock Islanc	41.51145	-90.5726	b4d277c3-f	-90.5726	41.51145		
461	MetroLINK	Government	4	Awarded (L MetroLINK CEJA/VW	Rock Islanc	Rock Islanc	41.51184	-90.5753	4659e081-f	-90.5753	41.51184		
462	MetroLINK-Axis Hotel	Hotels	4	Awarded (L MetroLINK CEJA/VW	Rock Islanc	Rock Islanc	41.50916	-90.5767	2950d6f0-f	-90.5767	41.50916		
463	Prairie Winds Motel	Hotels	4	Awarded (L Universal E CEJA/VW	Carthage	Hancock	40.40896	-91.167	e9d15adc-c	-91.167	40.40896		
464	John Wood Community College	Other Businesses	4	Awarded (L Adams Elec CEJA/VW	Quincy	Adams	39.9137	-91.3364	66d99070-f	-91.3364	39.9137		
465	Holiday Inn Quincy, an IHG Hotel	Hotels	4	Awarded (L Adams Elec CEJA/VW	Quincy	Adams	39.93835	-91.3385	64e8a845-f	-91.3385	39.93835		
466	Love's Travel Stop, Store #606	Gas Stations	4	Awarded (L Love's Trav CEJA/VW	South Holl	Cook	41.59997	-87.5798	2f4a8c6f-9	-87.5798	41.59997		
467	BP	Gas Stations	4	Awarded (L BP Product CEJA/VW	North Chic	Lake	42.31987	-87.867	25b96216-f	-87.867	42.31987		
468	The PRIDE of Lake County BP	Gas Stations	4	Awarded (L BP Product CEJA/VW	Kildeer	Lake	42.16645	-88.062	cf6ec240-f	-88.062	42.16645		
469	Thorntons	Gas Stations	4	Awarded (L BP Product CEJA/VW	Ottawa	LaSalle	41.3732	-88.8368	7b95fe5a-2	-88.8368	41.3732		
470	Frank Holten State Park (Site Office Area)	IDNR	2	Online	N/A	IDNR	East St. Lo	St Clair	38.59429	-90.1046	07e2aac5-f	-90.1046	38.59429
471	Giant City State Park (Lodge Prairie Cabin Parking Lot)	IDNR	2	Online	N/A	IDNR	Makanda	Union	37.59471	-89.1843	d44ee291-f	-89.1843	37.59471
472	Eldon Hazlet State Park (Main Thoroughfare)	IDNR	2	Online	N/A	IDNR	Cartlyle	Clinton	38.66863	-89.333	0e053674-f	-89.333	38.66862
473	Jim Edgar Panther Creek State Fish and Wildlife Area (Pheasant Building)	IDNR	2	Online	N/A	IDNR	Chandlervi	Cass	39.99775	-90.0697	81d68c6e-f	-90.0697	39.99775
474	Washington County State Recreation Area (Shower House Parking Lot)	IDNR	2	Online	N/A	IDNR	Nashville	Washington	38.28601	-89.3561	aa823093-f	-89.3561	38.28601
475	Starved Rock State Park (Lodge Parking Lot)	IDNR	2	Online	N/A	IDNR	Utica	LaSalle	41.31746	-88.9931	eea4ab1a-f	-88.9931	41.31746

Exhibit B

ObjectID	Site Host	Site Type	Level 2 Por	Level 3 Por	Online Stat	Grantee	Program Ty	City	County	LatDD	LongDD	GlobalID	x	y
95	Glenview Luxury, Imports LLC	Auto Dealers			4	Awarded (L Golf Green	CEJA/VW	Glenview	Cook	42.06054	-87.799	796ca686-i	-87.799	42.06054
107	Golf Mill Motor Sales, Inc.	Auto Dealers			6	Awarded (L Golf Green	CEJA/VW	Niles	Cook	42.05122	-87.8338	ef90a254-4	-87.8338	42.05122
108	Taylor Ford of Manteno	Auto Dealers			4	Online	Taylor Ford	Manteno	Kankakee	41.24478	-87.8343	a1c3c50f-1	-87.8343	41.24478
110	Golf Mill Chevrolet	Auto Dealers			6	Awarded (L Golf Green	CEJA/VW	Niles	Cook	42.05359	-87.8407	91eabbd0-	-87.8407	42.05359
116	Taylor Chrysler Dodge, Inc	Auto Dealers			4	Awarded (L Taylor Ford	CEJA/VW	Bradley	Kankakee	41.1703	-87.8525	75b17878-	-87.8525	41.1703
121	Jidd Holding/Countryside Mitsubishi	Auto Dealers			8	Awarded (L EVReady Er	CEJA/VW	Countryside	Cook	41.78418	-87.8691	419c36f9-7	-87.8691	41.78418
130	1529 Rand Rd	Auto Dealers			8	Awarded (L EVReady Er	CEJA/VW	Des Plaines	Cook	42.04731	-87.8862	089a69e3-	-87.8862	42.04731
132	Jidd Holding/Jidd Motors	Auto Dealers	10		8	Awarded (L EVReady Er	CEJA/VW	Des Plaines	Cook	42.0502	-87.8925	f2b31a41-t	-87.8925	42.0502
133	Jidd Holding/Jidd Motors	Auto Dealers			8	Awarded (L EVReady Er	CEJA/VW	Des Plaines	Cook	42.05619	-87.9035	96f75109-f	-87.9035	42.05619
211	Jidd Holding/Maserati of Naperville	Auto Dealers			8	Awarded (L EVReady Er	CEJA/VW	Naperville	DuPage	41.77271	-88.1856	48ad6194-	-88.1856	41.77271
270	Gjovik Ford	Auto Dealers			4	Online	Gjovik Ford	Plano	Kendall	41.66171	-88.5063	664815b3-	-88.5063	41.66171
277	Gjovik Chevrolet Buick GMC	Auto Dealers			6	Online	Gjovik Ford	Sandwich	Kendall	41.64894	-88.5848	26e7852e-	-88.5848	41.64894
406	Newbold Toyota	Auto Dealers				Awarded (L Seventeen	CEJA/VW	O'Fallon	St Clair	38.58597	-89.9401	2814d8ce-i	-89.9401	38.58597
407	Newbold BMW	Auto Dealers	10		4	Awarded (L Seventeen	CEJA/VW	O'Fallon	St Clair	38.58454	-89.9408	bad510e2-	-89.9408	38.58454