ALLIANCE FOR AUTOMOTIVE INNOVATION

May 14, 2026

Illinois Commerce Commission
Public Utilities Division
527 E Capitol Avenue
Springfield, IL 62701

Re: Auto Innovators' comments on Commonwealth Edison Company's Multi-Year Integrated Grid Plan, Docket 26-0047

Auto Innovators represents the full auto industry value chain, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country's GDP, responsible for supporting nearly 11 million jobs, and driving $1.5 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector[1].

I. Managed Charging: Basic Program Design Elements

Set enrollment targets based on projected EV adoption and benchmark progress annually. ComEd estimates 30,000 customers will enroll in its program over three years. It is not clear whether this is a goal the utility will strive to meet or whether it will implement mechanisms to track enrollment progress. Successful managed charging programs depend on high enrollment rates, low drop-out rates, and maximizing the kilowatts displaced annually. Maximizing customer participation also ensures ComEd will receive a large sample size of data that can inform ongoing program development to increase benefits to both drivers and the grid. Therefore, we encourage the Commission to require ComEd to set annual enrollment targets based on projected EV adoption and to track progress annually as part of ongoing program evaluation. At this stage of the market, these 'best practice' activities can help ComEd eventually scale to a mass market program, which is necessary to realize the full potential of EVs' grid benefits.

Telematics must remain an eligible pathway for vehicle participation in programs. Most EVs have a telematics system that can measure and manage EV charging load. Leveraging telematics can make home charging more affordable; consumers do not need to buy networked EVSE or dedicated utility meters to manage EV load, which can further support cost-effective implementation of EV rates and managed charging programs.

Customers claiming a residential charging incentive should be enrolled in a managed charging program. This scenario presents a low cost, low effort opportunity to inform customers of a managed charging program and enroll them. By integrating the enrollment process into the residential incentive application pipeline, ComEd can cost-effectively leverage an additional customer engagement channel to maximize program enrollment, which will increase ComEd's ability to meet its enrollment goals.

[1] **Alliance for Automotive Innovation.** (n.d.). *Resources and insights*. https://www.autosinnovate.org/resources/insights

II. Managed Charging: Requirements for Aggregators

Require aggregators to show how they will use one or more official automaker channels to maximize enrollment. Managed charging programs must have high enrollment rates to maximize the value they provide to the grid. Automakers have several well-established and trusted channels to engage their customers, including mobile applications, email marketing, dealerships, and other first-use integration opportunities (e.g. purchasing an OEM home charger and using their preferred vendor to install it. These channels offer a cost-effective pathway to enroll many customers efficiently.

Automakers are well-positioned to accelerate enrollment in managed charging programs because of their deep relationships with their customers. A vehicle is typically the second largest purchase in a consumer's lifetime; they become integrated into their lifestyles through everyday use– commuting to work, visiting friends and family, taking road trips, and more. For many drivers, their vehicle becomes an extension of their identity. Therefore, when they receive communications from their vehicle brand – through a mobile app, email, or otherwise – they are more likely to pay attention. This dynamic presents an opportunity: these channels can significantly increase enrollment in managed charging programs. For example, Toyota, using both its Toyota and Lexus apps, achieved a 20 percent customer enrollment rate over three years in its Clean Assist program, which enables drivers to match their charging with renewable energy to minimize environmental impacts[2]. Dealerships are also a critical venue to educate customers about managed charging programs and their benefits and subsequently enroll them. In this scenario, customers are already directly engaged with an automaker brand, presenting a zero cost, low hanging fruit opportunity to enroll them into a program.

Given this, we encourage the Commission to require aggregators to use automaker channels as a condition of being chosen via the RFP process to implement a managed charging program.

Require aggregators to target capacity-constrained circuits to maximize value to the grid. Optimizing charging at the secondary transformer and feeder level can significantly mitigate potential distribution system upgrades needed to support EV charging. Secondary transformers are the first distribution asset impacted by residential EV charging. It only takes a few EVs charging to overload a 25-50 kVA transformer[3]. Argonne National Lab (ANL) and Smart Electric Power Alliance estimated roughly $300 per EV a year in downstream distribution benefits alone by deferring transformer and feeder upgrades[4]. The Brattle Group similarly estimated roughly $200 in annual distribution savings when managed charging was optimized for the distribution system, compared to TOU-based charging[5]. Overall, the study estimated that annual utility system benefits from distribution optimized managed charging could be as high as $400 per EV compared to unmanaged charging. California's Public Advocates Office estimated that avoiding local peaks on capacity constrained feeders could avoid 42 percent of upgrade costs as compared to a baseline EV load shape[6]. Enabling distribution optimization is key to maximizing the effectiveness of managed charging, given the outsized distribution impacts of EV charging.

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[2] Blair, B., & Fitzgerald, G. *The State of Managed Charging in 2024: The Next Iteration: Distribution-Level Optimization*. September 2024. Smart Electric Power Alliance.

[3] DTE Energy. Electric Vehicle Grid Impact Study Summary Report. May 2020. <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/068t000000CFdYoAAL>

[4] Smart Energy Power Alliance, Exelon's Managed Charging Program, https://sepapower.org/resource/exelons-managed-charging-program/

[5] Brattle Group, Demonstrating the Full Value of Managed Electric Vehicle Charging, https://www.brattle.com/wp-content/uploads/2026/01/Demonstrating-the-Full-Value-of-Managed-Elec tric-Vehicle-Charging.pdf

[6] The Public Advocates Office, DGEM 2.0 Preliminary Results, https://www.publicadvocates.cpuc.ca.gov/-/media/cal-advocates-website/files/press-room/reports-and-a nalyses/241024-public-advocates-office-dgem-20-preliminary-results.pdf

Require aggregators to provide counterfactual assessments program participants and non-participants. Counterfactuals are critical to assessing the overall effects of a managed charging program. By requiring aggregators to analyze EV charging data sets between participants and non-participants, ComEd can better understand charging behaviors and the associated grid impacts. This analysis can help ComEd refine the program over time to increase its effectiveness. Conducting counterfactuals early in program implementation can save costs long-term by optimizing the program and help ComEd chart a course to a mass market program as EV adoption increases.

III. Bidirectional Charging

Provide incentives for bidirectional charging equipment. Bidirectional charging offers significant promise for the state's affordability, reliability, and grid modernization goals. Auto Innovators encourages the Commission to require ComEd to offer consumers an incentive for bidirectional charging equipment. This type of incentive sends a clear market signal that V2X is a grid resource that can reduce peak demand, defer infrastructure investments, and lower costs for all ratepayers.

Union of Concerned Scientists concluded that shifting EV participation from one-way managed charging to bidirectional charging nearly doubled total system savings at moderate participation levels, and under the right conditions significant V2X deployment can deliver more than 60 percent greater grid value than V1G-only scenarios[7]. These incremental benefits are driven primarily by deeper peak load reductions enabled by dispatchable EV exports during the most constrained hours, allowing EVs to function as short-duration storage resources rather than passive load-shifting assets. Together, these results demonstrate that supporting early consumer adoption of V2X through enhanced incentives can unlock substantially greater, cost-effective grid value than managed charging alone.

Respectfully submitted,

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[7] Houston, S. et al. Harnessing the Power of Electric Vehicles. Union of Concerned Scientists. June 2025. < https://www.ucs.org/resources/harnessing-power-electric-vehicles>.