

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

---

THE CITIZENS UTILITY BOARD	)	
and	)	
THE ENVIRONMENTAL DEFENSE FUND	)	
	)	Docket No. 14-____
Proceeding to Adopt a GHG Metric for	)	
Smart Grid Advanced Metering Infrastructure	)	
Deployment Plans filed Pursuant to	)	
Section 16-108.6 of the Public Utilities Act	)	

---

**Verified Petition of the Citizens Utility Board and  
Environmental Defense Fund to Initiate a Proceeding to  
Adopt a Metric for Reductions in Greenhouse Gas Emissions Associated with  
Smart Grid Advanced Metering Infrastructure Deployment Plans filed  
Pursuant to Section 16-108.6 of the Public Utilities Act**

Pursuant to the Rules of Practice of the Illinois Commerce Commission (“ICC” or “the Commission”), 83 Ill. Admin. Code § 200.100, the Citizens Utility Board (“CUB”) and the Environmental Defense Fund (“EDF”) hereby petition the Commission to initiate a proceeding to adopt a metric for measuring reductions in greenhouse gas (“GHG”) emissions (“GHG Metric”) associated with Smart Grid Advanced Metering Infrastructure Deployment Plans (“AMI Plans”) filed pursuant to Section 16-108.6 of the Public Utilities Act (“PUA” or “the Act”). 220 ILCS 5/16-108.6. The purpose of this proceeding will be to review and adopt the GHG Metric for use by utilities participating in the Energy Infrastructure Modernization Act (“EIMA”) which must file annual Advanced Metering Infrastructure (“AMI”) Plan updates before the Commission. 220 ILCS 5/16-108.5.6(e). In support of this Motion, CUB and EDF state the following.

1. CUB is a statewide organization of residential ratepayers with the duty to represent and protect the interests of the residential utility consumers of this state and the

legal authority to file this petition on behalf of its members. 220 ILCS 10/5(1)(a) and 220 ILCS 10/5(2)(d) and (e).

2. EDF is a non-profit organization whose mission is to preserve the natural systems on which all life depends. Guided by science and economics, EDF strives to find practical and lasting solutions to the most serious environmental problems.

3. The Commission has general supervision of all public utilities 220 ILCS 5/4-101. In Illinois, the Commission has general authority for “any matters covered by the provisions of the [Public Utilities] Act, or by any other Acts relating to public utilities.” 220 ILCS 5/10-101. The Commission has the authority under Illinois law to direct the utility to do what is reasonably necessary to accomplish the legislature’s objective. *Abbott Lab. Inc. v. Illinois Commerce Comm’n*, 289 Ill. App. 3d 705, 712, (1st Dist. 1997) , *citing Lake County Bd. of Review v. Prop. Tax Appeal Board*, 119 Ill. 2d 419, 427 (1988).

4. The Energy Infrastructure Modernization Act (“EIMA”) provides participating electric utilities in Illinois the option of participating in a performance-based formula rate scheme if the utilities meet specific investment requirements, including investments in smart grid technologies such as advanced metering infrastructure (“AMI”). 220 ILCS 5/108.5(b). It requires that each participating utility file an initial Smart Grid AMI Plan for review and approval by the Commission, and provides for annual ICC review on April 1st thereafter of each utility’s progress towards completing implementation of its AMI Plan. 220 ILCS 5/16-108.6(c), (e) .

5. Both the Commonwealth Edison Company (“ComEd”) and the Ameren Illinois Company (“Ameren”) have opted to participate in the EIMA’s performance-based formula rate structure. *See* ICC Dockets No. 11-0721 and 12-0001. Both utilities have also begun

deployment of AMI and other smart grid investments which are required by the EIMA. *See* ICC Dockets No. 12-0298 and 12-0244.

6. In 2012, CUB and the Environmental Law and Policy Center (“ELPC”) sponsored testimony from EDF regarding the need for additional tracking metrics associated with ComEd’s AMI Plan. *See* CUB/ELPC Ex. 1.2 REV, ICC Docket No. 12-0298 (May 16, 2012). The Commission concluded that these metrics, which were accepted by ComEd, “are useful and will provide valuable information as ComEd progresses toward full deployment.” *In re Commonwealth Edison Co. Petition for Statutory Approval of a Smart Grid Advanced Metering Infrastructure Deployment Plan pursuant to Section 16-108.6 of the Public Utilities Act*, Final Order, ICC Docket No. 12-0298, at 19 (June 22, 2012) (“12-0298 Final Order”). ComEd was directed to then modify its AMI Plan “to include the list of tracking measures agreed upon and to clearly state that the results will be provided to the Commission and stakeholders.” *Id.* By April 1, 2013, ComEd was to include in its AMI Plan a baseline for each measure, which can be updated in each annual filing to ensure reasonable progress with respect to the identified tracking measures. *Id.*

7. In 2013, ComEd, CUB and EDF had numerous discussions regarding the means of calculation and baselines for all of the metrics save two: reductions in line loss and reductions in GHG emissions associated with smart grid technology. *See* CUB/ELPC Verified Init. Comments at 5-6, ICC Docket No. 13-0285 (May 7, 2013). The Commission noted that these two metrics were not just significant but in fact “metrics that appear to affect the very heart of the [EIMA], as they concern the potential societal benefits associated with Smart Grid AMI deployment.” *In re Commonwealth Edison Company Investigation Regarding Progress in Implementing the Advanced Metering Infrastructure*

*Deployment Plan*, Final Order, ICC Docket No. 13-0285, at 11 (June 26, 2013) (“13-0285 Final Order”). Given the slow pace of ComEd’s AMI deployment at the time, the Commission chose to allow these metrics to develop after stakeholder discussions rather than order ComEd to include these two in its 2014 AMI Progress Report (“AIPR”). *Id.* The Commission noted that it hoped these discussions would conclude in time for ComEd to include these two metrics in that filing. *Id.*

8. In 2012, Ameren presented its initial AMI Plan for review and approval by the Commission. *See* ICC Docket No. 12-0244. CUB and ELPC again recommended that the Commission direct Ameren to include additional metrics to measure the consumer and environmental benefits of smart grid. *See* CUB/ELPC Ex. 1.0 2ndC at 21 (April 27, 2012). The Commission declined to do so at that time, noting that it would have the opportunity to review Ameren’s progress on an annual basis to help ensure that Ameren’s AMI deployment successful in realizing full AMI functionality, operational and customer benefits. *In re Ameren Illinois Company Verified Petition for Approval of Smart Grid Advanced Metering Infrastructure Deployment Plan*, Final Order, ICC Docket No. 12-0244, at 25 (May 29, 2013) (“12-0244 Final Order”). The Commission then encouraged Ameren and interested stakeholders to continue the dialogue, outside of the ICC proceeding, on the appropriate measurements of the AMI Plan’s success. *Id.*

9. In 2013, Ameren filed its AIPR, and noted that Ameren had voluntarily adopted many of the same CUB/EDF/ELPC metrics as adopted by ComEd. *Ameren Illinois Advanced Metering Infrastructure ICC Update, April 2013* at 13-14 (April 2, 2013). Ameren stated it would voluntarily continue discussions with CUB, ELPC and EDF, including participation in

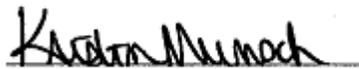
workshops, around several of the metrics but in particular around potential methods by which to estimate GHG emissions reduced by smart grid technology. *Id.*

10. Over the past year, CUB and EDF have worked with both ComEd and Ameren on means by which to calculate reductions in GHG emissions associated with smart grid technology. These discussions included representatives of the regional transmission organizations of which each utility is a member, PJM Interconnection, L.L.C., (“PJM”) for ComEd and the Midcontinent Independent System Operation, Inc. (“MISO”) for Ameren. As a result of those discussions, CUB and EDF believe that a final means of calculating this metric for each utility has been determined. The final ComEd metric is attached to this Petition as Attachment 1, and the final Ameren metric is attached to this Petition as Attachment 2, both of which CUB and EDF believe reflects those discussions.

11. CUB and EDF request that the ICC initiate a proceeding to adopt the GHG Metric for each participating utility and the proposed method of calculation be as described in Attachments 1 and 2. CUB and EDF further request that ComEd and Ameren be directed to include in their 2015 AMI Progress Reports baselines associated with the metric. In that proceeding, CUB and EDF agree to accept electronic service as governed by Part 200.150 of the Commission’s rules. 83 Ill. Admin. Code §200.150.

Dated: September 10, 2014

Respectfully submitted,



Kristin Munsch  
Attorney for the CITIZENS UTILITY BOARD  
309 W. Washington St., Ste. 800  
Chicago, IL 60606  
(312) 263-4282  
[kmunsch@citizensutilityboard.org](mailto:kmunsch@citizensutilityboard.org)



---

Michael Panfil  
Attorney for ENVIRONMENTAL DEFENSE FUND  
US Climate and Energy Program  
1875 Connecticut Ave., NW  
Washington, DC 20009  
(202)572 3280  
mpanfil@edf.org