

# Net Metering

## Changes in Illinois

### Frequently Asked Questions for Approved Vendors and Designees

#### **1. WHAT CHANGES ARE COMING TO NET METERING IN ILLINOIS? WHEN CAN THESE CHANGES BE EXPECTED?**

Net metering is changing for ComEd, Ameren, and MidAmerican residential and small commercial utility customers. Under Illinois law, full retail rate net metering will no longer be available for new distributed generation customers registering for net metering on and after January 1, 2025. After that date, customers installing a distributed generation system will receive only energy supply credits for the excess energy generated by their system and sent back to the grid.

#### **2. HOW WILL MY UTILITY DETERMINE WHETHER MY SYSTEM IS ELIGIBLE FOR FULL RETAIL RATE NET METERING OR THE NEW NET METERING RATES?**

In order for a residential or small commercial project to be guaranteed full retail rate net metering in the ComEd and Ameren service territories, the Certificate of Completion (if in ComEd territory) or Witness Test Request (if in Ameren territory) must be submitted by 5 p.m. on December 13, 2024. The submissions must be complete and accurate – there is no cure period for errors. If the Certificate of Completion or Witness Test Request is submitted after 5 p.m. on December 13, but prior to the end of December 2024, the utility may still complete its review and the project *may* be eligible for full retail rate net metering, but there is no guarantee that the review will be completed in time to obtain full retail rate net metering for the project.

In order for a project to receive full retail rate net metering in the MidAmerican service territory, customers must submit their net metering application to the utility before January 1, 2025.

Full retail rate net metering is not available for any solar project that takes the utility-distributed generation rebate (also called the smart inverter rebate). These rebates are only available from ComEd and Ameren.

### **3. WHAT DOES A CUTOFF DATE MEAN FOR CUSTOMERS TO RECEIVE FULL RETAIL RATE NET METERING VERSUS SUPPLY-ONLY NET METERING?**

ComEd and Ameren customers receiving Permission to Operate from their utility after the relevant cutoff date will be eligible for the supply-only crediting.

MidAmerican customers who submit a net metering application before January 1, 2025, will be eligible for full retail rate net metering, but those who submit an application after that date will be eligible for supply-only net metering.

More details on these changes from each utility can be found here:

- ComEd:
  - [General Net Metering Information](#)
  - [Changes to Net Metering](#)
- Ameren:
  - [General Net Metering Information](#)
- MidAmerican:
  - [General Net Metering Information](#)

### **4. WHAT IF A CERTIFICATE OF COMPLETION (“COC”) OR WITNESS TEST REQUEST (“WTR”) SUBMITTED PRIOR TO DECEMBER 13, 2024, IS INCOMPLETE OR HAS ERRORS?**

The Agency understands that ComEd and Ameren will be able to complete reviews of COCs and WTR submissions on or before December 13, 2024, but neither ComEd or Ameren will be able to provide an extension or a cure period beyond that point for any COC/WTR submitted on or before December 13, 2024, that is determined to be incomplete, inaccurate or to contain material defects. If the utility requires a new/modified COC/WTR be submitted, it must be received on or before December 13 to ensure it can be reviewed for completion in 2024.

MidAmerican requires that the customer submit a completed net metering application prior to January 1, 2025, rather than a COC or WTR.

### **5. WHY IS THE DEADLINE FOR COC/WRT SUBMISSION FOR COMED AND AMEREN ON DECEMBER 13, 2024, AND NOT DECEMBER 31, 2024?**

The Agency understands that ComEd and Ameren will require distributed generation systems to be built and operational prior to January 1, 2025, to be eligible for full retail rate net metering credits. A deadline of December 13, 2024, cutoff provides 10 business days for the utilities to review Certificates of Completion/Witness Test Requests for completion prior to the end of the 2024 calendar year.

## **6. CAN SYSTEMS THAT ARE APPROVED FOR NET METERING PRIOR TO JANUARY 1, 2025, LOSE THEIR ELIGIBILITY FOR FULL RETAIL NET METERING IN THE FUTURE?**

Under Illinois law, eligible systems registered for full retail net metering before January 1, 2025, will continue to receive net metering services under the current methodology for the lifetime of the system, regardless of whether those customers change electricity providers or whether the customer receiving the benefit from that system changes. Systems receiving full retail rate net metering prior to December 31, 2024, shall maintain eligibility for full retail rate net metering for the life of the facility, unless the system is modified in the following circumstances:

- For ComEd, such that a new interconnection application is required
- For Ameren, such that the nameplate capacity increases by more than 100%

## **7. WILL THE INTERCONNECTION APPLICATION PROCESS CHANGE BEGINNING JANUARY 1, 2025?**

No, the current interconnection application review processes will not change for ComEd, MidAmerican, or Ameren.

## **8. IF A PROJECT WITH FULL RETAIL RATE NET METERING CREDIT CHANGES OWNERSHIP, WILL IT LOSE ITS NET METERING ELIGIBILITY?**

No, the net metering services stay with the system itself. Therefore, customers that acquire projects eligible for the legacy full retail rate net metering will receive those rates.

## **9. WHY IS NET METERING CHANGING?**

The Climate and Energy Jobs Act (CEJA), which was signed into law in September of 2021, provides that, starting January 1, 2025, new residential and small commercial net metering customers in the ComEd, Ameren, and MidAmerican territories will receive supply-only net metering, rather than full retail rate net metering. ComEd and Ameren customers are eligible for a “Distributed Generation” or “Smart Inverter” rebate from the utility (which is separate from incentives provided through the Illinois Shines program). If a residential or small commercial customer in the ComEd or Ameren territory elects to receive the rebate in 2024, they will no longer be eligible for full retail rate net metering, and will instead receive supply-only net metering. In 2025 and later, all net metering customers in ComEd and Ameren territories (regardless of whether they take the rebate) will receive supply-only net metering.

## 10. HOW WILL THE ILLINOIS SOLAR FOR ALL MINIMUM SAVINGS REQUIREMENTS AND PARTICIPANT SAVINGS CALCULATIONS OF PROJECTS BE IMPACTED BY THESE COMING RATE CHANGES?

The IPA is currently researching how savings can be modeled under the new net metering structure and has surveyed stakeholders for proposals on how to adjust the assumed value of electricity generation under the new metering structure. The Agency plans to update the ILSFA Disclosure Forms to provide an estimate of the generation value for projects receiving supply-only net metering. The Agency expects to release proposed program updates for stakeholder feedback later in 2024 and those updates will include how the IPA proposes to incorporate the upcoming net metering rate changes into ILSFA savings calculations. The Agency also notes that ComEd and Ameren will be implementing low-income discounted electric utility rates in 2025, and how those discounts are implemented may impact the value proposition of going solar. The Agency will consider additional Program updates on savings requirements for ILSFA as more information about the implementation of the low-income discount rates becomes available. Further updates on this process will be released through ILSFA stakeholder notifications as implementation details coming rate changes become available. You can [sign up to receive ILSFA stakeholder announcements and program updates](#) on the ILSFA website.

## 11. WHERE CAN I FIND MORE INFORMATION ON THESE CHANGES FROM THE ILLINOIS ELECTRIC UTILITIES?

- ComEd:
  - [General Net Metering Information](#)
  - [Changes to Net Metering](#)
- Ameren:
  - [General Net Metering Information](#)
- MidAmerican:
  - [General Net Metering Information](#)

## Net Metering Unavailability Customer Acknowledgement Form

### 1. WHEN DOES A CUSTOMER HAVE TO SIGN THE NET METERING UNAVAILABILITY CUSTOMER ACKNOWLEDGEMENT FORM?

This form is required when a customer's project is located in the service territory of a municipal electric utility or rural electric co-operative, and when the solar project will not receive net metering credits comparable to what the customer would receive if the project was located in the service territory of ComEd, Ameren, or MidAmerican.

## **2. WHY DOES THE CONSUMER PROTECTION HANDBOOK REQUIRE THE USE OF THE NET METERING UNAVAILABILITY CUSTOMER ACKNOWLEDGEMENT FORM?**

The standard Disclosure Forms includes an estimate of the monetary value of electricity generated by the solar project. Up to and through late 2024, the Disclosure Forms assume that the customer will receive full retail rate net metering, and electricity generated by the system is valued at the retail rate (for ComEd, Ameren, and MidAmerican, the portal uses current utility retail rate; for municipal electric utilities and rural electric co-operatives, the portal uses a state-wide average retail rate). If a customer does not receive comparable net metering credits from their utility or co-operative, it is important that the customer understands this and how it may affect the overall financial benefits of the solar project.

Note that beginning in December 2024 or January 2025, the portal will be updated to estimate the value of electricity from solar projects that receive supply-only net metering. The Net Metering Unavailability Customer Acknowledgment Form is required when the customer is not going to receive credits comparable to what they would receive if they were located in ComEd, Ameren, or MidAmerican service territories—this standard for when the Form is required will be the same after ComEd, Ameren, and MidAmerican change to supply-only net metering for residential and small commercial customers.