

Thank you for the opportunity to provide comment to the IPA on updating the DG Disclosure Forms for Supply-Only Net Metering.

Please accept these comments on behalf of the Illinois Municipal Utilities Association (IMUA). The IMUA is a nonprofit service organization that represents Illinois municipalities that own and operate public utility systems, of which there are 42 municipally owned electric utilities in Illinois.

Feedback Item #4

With regards to Feedback Item #4, we concur with your recommendation for the disclosure form to include a section in which the Approved Vendor or Designee provides a short explanation of the type of crediting available in that jurisdiction. Each municipal electric utility is committed to ensuring residential and small commercial customers can install renewable generating facilities, self-generate electricity and receive appropriate credits for electricity not used onsite. Illinois law recognizes that municipal systems and electric cooperatives may reasonably implement different policies than investor-owned utilities (220 ILCS 5/17-900). As such, not all policies are identical and the option to include a summary of the appropriate crediting policy in the relevant jurisdiction is appropriate.

Illinois municipal electric utilities are still vertically integrated. Therefore, they have a bundled rate that includes both supply and delivery. There is not a separate “supply” line item on a customer bill. As such, a municipal utility either offers full retail net metering, or in its place the local municipal governing body has developed a policy to calculate a credit that is similar to the “supply” rate offered by an investor-owned utility.

Due to these differences, we agree with your recommendation to include a short explanation of the type of crediting available rather than a generic average state-wide retail rate and supply rate.

Feedback Item #9

With regards to Path 2 in Feedback Item #9, we refer to our previous statement that Illinois municipal utilities have a bundled rate that does not have a separate “supply” rate. However, each municipal electric utility has a rate that they credit for excess solar (electricity not used onsite and is sent back to the local distribution system), hence this could replace the “supply” rate. Therefore, we would recommend the following change:

- Residential and small commercial customer’s average supply net metering credit rate for energy not used onsite and sent back to the local distribution system over the past 12 months

Feedback Item #10

In order to best estimate the percentage of electricity used directly onsite, we would recommend the automatic calculator allow for the input of at least one year of monthly historical kWh usage for the customer and compare that to the estimated production levels of the proposed solar array to produce an automatic calculation of how much energy would be used on site by month. This would ensure accuracy, rather than a vendor needing to develop an estimate of the percentage of electricity used directly onsite.

Thank you for your consideration. We are available for any questions.