

FAQs Related to Changes in Net Metering in Illinois: AV- and Designee-Facing

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Participant (AV- and Designee-Facing) Questions

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 PM on December 31, 2024. **(Note: this date was updated to December 31, from December 13, on October 4, 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 PM on December 31, but prior to the end of December 2024, the utility may still complete their 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 that 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: <https://www.comed.com/smart-energy/my-green-power-connection/developers-contractors/net-metering>

- Changes to Net Metering: https://azure-na-assets.contentstack.com/v3/assets/blt3ebbb3fed6084be2a/blt81f54d30b184ae59/66630a42613ade000a0858cd/ComEd_2025-Changes-To-NetMetering.pdf
- Ameren:
 - General Net Metering Information: <https://www.ameren.com/illinois/residential/supply-choice/renewables/net-metering>
- MidAmerican:
 - General Net Metering Information: <https://www.midamericanenergy.com/customer-interconnection#IllinoisApp>

4. What if a Certificate of Completion (“COC”) or Witness Test Request (“WTR”) submitted prior to December 31, 2024 is incomplete or has errors? (Note: this date was updated to December 31, from December 13, on October 4, 2024).

- The Agency understands that ComEd and Ameren will be able to complete reviews of COCs and WTR submissions on or before December 31, 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 31, 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 31 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/WTR 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 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. Where can I find more information on these changes from the Illinois electric utilities?

- ComEd:
 - General Net Metering Information: <https://www.comed.com/smart-energy/my-green-power-connection/developers-contractors/net-metering>
 - Changes to Net Metering: https://azure-na-assets.contentstack.com/v3/assets/blt3ebb3fed6084be2a/blt81f54d30b184ae59/66630a42613ade000a0858cd/ComEd_2025-Changes-To-NetMetering.pdf
- Ameren:
 - General Net Metering Information: <https://www.ameren.com/illinois/residential/supply-choice/renewables/net-metering>
- MidAmerican:
 - General Net Metering Information: <https://www.midamericanenergy.com/customer-interconnection#IllinoisApp>

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 include 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 Acknowledgement 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.

Consumer-Facing Questions

1. What is net metering?

- Net metering credits you for your electricity that your solar project sends to the utility electric grid. If your solar project generates more electricity than you use, the excess electricity flows to the grid and you will receive a credit on your bill for that electricity.

Rural electric cooperatives and municipal electric utilities may limit access to net metering or may offer a different approach for crediting customers for electricity that is sent to the grid.

2. What changes are coming to net metering in Illinois? When can these changes be expected?

- Net metering policies and rates for ComEd, Ameren, and MidAmerican distributed generation (on-site) residential and small commercial solar customers are changing. Full retail rate net metering will no longer be available to residential and small commercial customers net metering customers interconnecting new renewable energy systems after December 31, 2024.

Your utility will “net out” the electricity that your project sends to the grid against the electricity that you pull from the grid. For example, if your solar project sends 400 kWh of extra electricity to the grid, and you use 500 kWh of electricity from the grid, your net usage would be 100 kWh. **You will then only pay supply and transmission charges for that net usage.**

With supply-only net metering, electric delivery charges are no longer included in net metering. This means that customers will pay delivery charges for the entire amount of electricity that they pull from the grid, regardless of how much electricity they send back to the grid. With the above example, you would pay supply and transmission charges for 100 kWh, but you would pay delivery charges for the full 500 kWh pulled from the grid. Your electric bill will also include non-volumetric (not based on kWh used) customer charges and fees.

Customers that have systems installed that are already receiving full retail rate net metering will continue to receive full retail rate net metering for the life of their system, or unless the solar project is modified so extensively that it requires a new interconnection agreement (in ComEd territory) or doubles the nameplate capacity of the project (in Ameren territory).

3. When will net metering changes take place?

- Under Illinois law, customers beginning net metering service on or after January 1, 2025 will receive net metering just for supply charges, rather than the full retail rate net metering. The Agency understands that as a result, ComEd will require customers submit a certificate of completion by December 31, 2024 to be assured full retail rate net metering, and that Ameren will require customers to submit the Witness Test Request by December 31, 2024 to be assured full retail rate net metering. If the submissions are incomplete or have errors, or if they are submitted after 5 PM on December 31, 2024 but before January 1, 2025, the utilities may or may not be able to review and approve net metering before the January 1 deadline. **(Note: this date was updated to December 31, from December 13, on October 4,**

2024). MidAmerican requires that a completed net metering application be submitted prior to January 1, 2025 for the solar project to receive full retail rate net metering.

4. How do I know if I have full retail rate net metering?

- Residential and small commercial customers interconnected to Ameren or ComEd prior to January 1, 2025 who did not request a Distributed Generation Rebate from the utility will continue to have full retail net metering for the life of the system unless material modifications are made. Residential and small commercial customers in MidAmerican territory who submit a net metering application prior to January 1, 2025, will receive full retail rate net metering. If you are unable to determine if you are receiving full retail rate net metering, you may want to check with your utility.

5. If I decide to purchase my leased or PPA Distributed Generation system, will I benefit from full retail rate net metering?

- If the system has been receiving full retail rate net metering prior to January 1, 2025, it will continue to receive full retail rate net metering even if ownership of the project changes.

6. Is my net metering rate affected if I make changes to my system, like adding more panels?

- If your system is enrolled in the legacy full retail rate net metering, meaning it was interconnected prior to January 1, 2025 and you did not request a DG (also called “Smart Inverter”) rebate with the utility, the net metering rate will change if the system is modified under the following circumstances:
 - For ComEd, changes to the system that require a new interconnection application
 - For Ameren, an increase to the system’s nameplate capacity of more than 100%

7. What is the difference between the full retail net metering rate and the new net metering rate?

- Customers enrolled in net metering on or after January 1, 2025, will only receive supply credits, meaning that customers whose systems send excess energy to the grid will be compensated at a lower rate per kilowatt-hour than those already enrolled in net metering.

8. Will the net metering changes affect the amount of savings I see from installation of solar at my home or business?

- If your system was fully interconnected and receiving full retail rate net metering prior to December 31, 2024, and did not receive a Distributed Generation or Smart Inverter rebate from the utility, the amount of savings will not be affected unless material changes are made to the system.

Customers whose project is approved for net metering after December 31, 2024 will be enrolled to the new net metering rates and will only receive supply credits.

9. *Where can more information from each utility on net metering changes be found?*

- ComEd:
 - General Net Metering Information: <https://www.comed.com/smart-energy/my-green-power-connection/developers-contractors/net-metering>
 - Changes to Net Metering: https://azure-na-assets.contentstack.com/v3/assets/blt3ebb3fed6084be2a/blt81f54d30b184ae59/66630a42613ade000a0858cd/ComEd_2025-Changes-To-NetMetering.pdf
- Ameren:
 - General Net Metering Information: <https://www.ameren.com/illinois/residential/supply-choice/renewables/net-metering>
- MidAmerican:
 - General Net Metering Information: <https://www.midamericanenergy.com/customer-interconnection#IllinoisApp>