



**INFORMAL COMMENTS OF THE ALLIANCE FOR SOLAR CHOICE  
REGARDING DRAFT REVISIONS TO THE ILLINOIS NET METERING RULE**

**MAY 30, 2014**

The Alliance for Solar Choice (“TASC”) appreciates the opportunity to provide informal comment to Illinois Commerce Commission Staff regarding Staff’s May 13, 2014 draft revisions to the Illinois net metering rule (83 Ill. Adm. Code Part 465).

TASC leads advocacy across the country for the rooftop solar industry. Founded by the largest rooftop companies in the nation, TASC represents the vast majority of the rooftop solar market. TASC members include: Demeter Power, SolarCity, Solar Universe, Sungevity, Sunrun, and Verengo.<sup>1</sup> These companies are responsible for tens of thousands of residential, school, church, government and commercial solar installations in the United States.

Comments provided to Staff on June 19, 2013 by the Environmental Law & Policy Center (ELPC), the Citizens Utility Board (CUB), the Vote Solar Initiative (VSI), Interstate Renewable Energy Council, and the Solar Energy Industries Association stress the importance of net metering policy to expanding consumer choice in electricity supply and providing a solid foundation for in-state solar growth that promotes low solar costs for consumers. Previous comments from ELPC, CUB and VSI highlight that “net metering is one of the most effective policies for supporting customer generation of renewable energy, and is currently enabling customer-sited generation in 43 states and the District of Columbia.” TASC wholeheartedly agrees.

TASC supports Staff’s recent proposed modifications to the Illinois net metering rule. TASC believes Staff’s modifications are consistent with amendments to Section 16-107.5 of the Illinois Public Utility Act and introduce a number of beneficial clarifications into the rule. However, to promote further consistency with Illinois statute, and to ensure compliance with Illinois law, TASC respectfully proposes that Staff consider a further modification of the net metering rule. Specifically, as proposed in comments filed contemporaneously by ELPC, TASC proposes that the Commission’s net metering rule expressly incorporate the following provision of Illinois’ net metering statute:

An electricity provider shall provide electric service to eligible customers who utilize net metering at non-discriminatory rates that are identical, with respect to rate structure, retail rate components, and any monthly charges, to the rates that the customer would be charged if not a net metering customer. An electricity provider shall

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<sup>1</sup> <http://allianceforsolarchoice.com>

not charge net metering customers any fee or charge or require additional equipment, insurance, or any other requirements not specifically authorized by interconnection standards authorized by the Commission, unless the fee, charge, or other requirement would apply to other similarly situated customers who are not net metering customers.

220 ILCS 5/16-107.5(e-5).

The above quoted section of Illinois statute provides customers installing on-site solar with assurance that their decision to do so will not subject them to punitive charges or treatment. This assurance is critical to customers in understanding the economic costs and benefits of installing an on-site solar system. Incorporating the above-quoted section of Illinois statute into the Commission's rules will provide additional clarity to customers, electricity providers and solar companies regarding an important aspect of Illinois net metering law.

TASC appreciates the opportunity to provide informal comment to Staff. TASC looks forward to sustained engagement in Illinois on solar policy issues to enable a strong solar industry that can help deliver low cost, clean energy to Illinois consumers and further expand consumer energy options.

Respectfully submitted,

A handwritten signature in cursive script that reads "Anne Smart".

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