STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission On Its Own Motion	)))))	Docket No. 15-0273
Amendment of 83 Ill. Adm. Code 465	)	

VERIFIED REPLY COMMENTS OF THE
STAFF OF THE ILLINOIS COMMERCE COMMISSION

The Staff of the Illinois Commerce Commission ("Staff"), by and through its undersigned counsel, pursuant to Section 200.830 of the Rules of Practice of the Illinois Commerce Commission ("Commission" or "ICC") (83 Ill. Adm. Code 200.830), respectfully submits its Verified Reply Comments ("Reply Comments") in the instant proceeding.

I. BACKGROUND

Over the two years preceding the instant docket, Staff and interested parties conducted several workshops and Staff circulated multiple drafts of proposed amendments to 83 Ill. Adm. Code 465 ("Net Metering Rule") to workshop participants, upon which workshop participants informally commented. On March 23, 2015, Staff filed with the Commission its Staff Report and proposed amendments to the Net Metering Rule ("Draft Rule"), which addressed some of the comments received by the parties during the informal workshop and comment process. On April 8, 2015, the Commission initiated the instant proceeding to develop rules regarding net metering to implement the provisions of Section 16-107.5 of the Public Utilities Act ("PUA" or "Act") 220 ILCS 5/16-107.5 *See*

ICC On Its Own Motion, ICC Order Docket No. 15-0273 (Apr. 8, 2015) ("Initiating Order"), and opening the first notice period for the rulemaking for the Draft Rule. Initiating Order at 1, 2. The Draft Rule was attached to the Initiating Order as an Appendix.

The following parties intervened: Citizens Utility Board ("CUB"), Commonwealth Edison Company ("ComEd"), Ameren Illinois Company ("Ameren"), Illinois Competitive Energy Association ("ICEA"), Environmental Law & Policy Center ("ELPC"), Retail Energy Supply Association ("RESA"), the People of the State of Illinois ("AG"), MidAmerican Energy Company ("MidAmerican"), Elevate Energy ("Elevate"), and the City of Chicago ("City").[1]

On June 24, 2015, Verified Initial Comments ("Initial Comments") were received from the following parties: RESA, the AG, ComEd, CUB and the Environmental Defense Fund ("EDF"),[2] (jointly "CUB/EDF"), Elevate, MidAmerican, the City, and ELPC. Staff's Reply Comments follow.

II. REPLY COMMENTS

Staff does not respond to every argument raised by every party that filed Initial Comments. Where Staff does not respond to an argument, Staff refers to the arguments made in its Staff Report and supports the language of the Draft Rule.

In these Reply Comments, Staff details proposed modifications to specific sections of the Draft Rule, and indicates its acceptance of proposed modifications from other parties. These modifications are also contained in their entirety in a redlined version of

[1] The respective petitions to intervene of CUB and ICEA were held in abeyance on June 2, 2015 by the Administrative Law Judge, as representatives for those parties were not present at the status hearing that day. All other petitions to intervene were granted on June 2, 2015.
[2] While CUB filed a motion to intervene, the Environmental Defense Fund failed to do so. Regardless, CUB and EDF jointly filed Initial Verified Comments.

the Draft Rule attached hereto as Attachment A. New additions to the Draft Rule are indicated by double underlining.

A. SECTION 465.35 NET METERING APPLICATION AND ENROLLMENT PROCEDURES

Parties raised issues with several subsections of Section 465.35; Staff addresses these on a subsection by subsection basis.

First, ComEd argues subsection 465.35(e) has a typographical error. ComEd Initial Comments at 4. As Staff attempted to make clear in its informal comments, there is no typographical error. Rather, the sentence in question simply lists three regulatory or statutory mandates that may not be violated in denying a prospective net metering customer's application: (1) this Part (proposed Part 465); (2) 83 Ill. Adm. Code Part 466 (dealing with interconnection of distributed generation); and (3) Section 16-107.5 of the Act. Initiating Order, Appendix at 5.

Electricity providers must not violate the Act or the Commission's regulations in any instance, but this sentence merely points out the specific rules and statutes at issue when an electricity provider considers a net metering application. *See id.* Interconnection of distributed generation is an integral aspect of successful net metering for any customer – the customer's generating facility (which will be a distributed generation facility in most, if not all, relevant net metering cases) must be able to interconnect before a customer can net meter.

Next, RESA protests it is ambiguous whether the requirement of subsection 465.35(j), which requires the electricity utility to notify an alternative retail electric supplier ("ARES") when the utility's non-competitive customer switches its supply service to the ARES, also applies when a customer switches from one ARES to another. To remedy

this possible problem, RESA recommends amending subsection 465.35(k). RESA Initial Comments at 2.

In response to RESA, Staff recommends that subsection 465.35(j) be modified to include switches between an electric utility to an ARES, from an ARES to an electric utility, or from one ARES to another. Thus, Section 465.35(j) would be modified as follows:

> j) With respect to any non-competitive customer authorized for net metering offered by an electric supplier ~~utility~~ that is switching to another electric supplier ~~ARES~~, the electric utility must notify the customer's new electric supplier ~~ARES~~ via an electronic method approved by the utility of the customer's status as a net metering customer.

ComEd and RESA also suggest modification of subsection 465.35(k). Subsection 465.35(k) was added to Section 465.35 because, under current practice, a customer's net metering status is cancelled when the customer switches from one supplier to another. A customer may not be aware that it must enroll in the new supplier's net metering program to continue net metering. And, in some instances, a customer's new supplier may not be aware of the customer's interest in continuing net metering with the new supplier. Subsection 465.35(k) is intended to ensure that an existing net metering customer can enroll in its new supplier's net metering program with a minimum of delay or disruption.

Subsection 465.35(k) requires a net metering customer's new supplier to inform the customer within 15 calendar days after the electric utility accepts the new supplier's enrollment request of the steps required for the customer to apply for net metering with the new supplier. The term enrollment request refers to the electric utility's processing and acceptance of the new electric supplier's electronic request to switch the customer to the supplier.

Staff believes this is a workable process because of the utilities' responses to Staff's data requests ("DRs") indicating that their customer record systems identify each customer's net metering status, regardless of whether a customer takes supply from an ARES or from the utility.[3] And, enrollment requests are typically processed several weeks in advance of a customer's switch date. During that period, a supplier can inform its new customer of the steps needed to enroll in the supplier's net metering program.

Under ComEd's proposed revision of subsection 465.35(k), the 15-day clock starts when the customer informs the new supplier of its intention to enroll in the supplier's net metering program; that is, it is the responsibility of the customer to inform the new supplier of the customer's interest in net metering. ComEd Initial Comments at 4. But, as noted, in some instances a customer will not even be aware that its net metering status is cancelled and thus it may not occur to the customer that it should communicate with its new supplier about net metering. Staff recommends retaining subsection 465.35(k) as written.

ComEd argues that the term "electricity provider" should be modified to be "electricity supplier" in all instances throughout subsection 465.35. ComEd Initial Comments at 3, Appendix at 4-7. Staff can agree to ComEd's suggestion, based on Staff's understanding that prospective net metering customers need only apply for net metering from an electricity supplier and not from the entity delivering electricity.

[3] ComEd Response to Staff DR EPS 1.01; Ameren Response to Staff DRs EPS 1.01 & 1.02; MidAmerican Response to Staff DR EPS 1.01; Mt. Carmel Public Utility Company's Response to Staff DR EPS 1.01 & 1.02.

B. SECTION 465.40 REPORTING REQUIREMENTS

ComEd suggests modifications to subsection 465.40 that would effectively eliminate any reporting requirements for entities providing delivery service to customers. *See* ComEd Initial Comments, Appendix at 7-8. This provision is intended to be required of all electricity providers because the statutory reporting requirement is a general requirement applicable to electricity providers. 220 ILCS 5/16-107.5(k); *see* Draft Rule at 7-8. As such, the Commission should ignore ComEd's proposed modifications and maintain the Draft Rule language as originally drafted in this subsection. Draft Rule at 7-8.

The AG recommends provisions that would require Staff to maintain a portion of the Commission website that includes copies of each electric supplier's annual report and lists the electric suppliers that fail to submit an annual report. Staff would also be required to create a summary of the annual reports. Additionally, the AG recommends adding a paragraph to Section 465.35 specifying how a reporting entity's claims of confidential data should be submitted to the Commission. CUB/EDF also provide the recommended provisions in their Initial Comments. ELPC recommends adoption of the provisions. AG Initial Comments at 2-3; CUB/EDF Initial Comments at 2-3; ELPC Initial Comments at 6-7.

Staff does not object to modifying Section 465.40 to make clear that the electric providers' annual reports should be available on the Commission website. Thus, Staff recommends that the following sentence be added at the end of Section 465.40: <u>The Commission shall maintain the reports required by this Section on the Commission's website.</u> To facilitate posting of the reports, Section 465.40 should also state that electric

providers should file the reports electronically with the Chief Clerk's Office. If these changes are adopted, Staff will provide instructions to electricity providers regarding how annual reports may be submitted electronically.

Thus, Staff recommends that Section 465.40 be modified as follows:

> The annual report required by Section 16-107.5(k) of the Act shall be filed electronically with the Chief Clerk ~~Manager of the Energy Division~~ of the Illinois Commerce Commission, in a manner that meets all filing requirements of the Commission's electronic filing system, by April 1 of each year beginning in 2009. The report shall include all information required under Section 16-107.5(k) of the Act, including, but not limited to, the following information: the total number of net metering customers served ~~peak demand supplied~~ by the electricity provider; ~~during the previous year;~~ the type, capacity, and energy sources of the generating systems used by the electricity provider's net metering customers; whether the total generating capacity of the electricity provider's ~~its~~ net metering customers~~;~~ equals or exceeds the 5% cap; and, whether the electricity provider intends to limit the total generating capacity of its net metering customers to 5~~1~~%~~;~~ ~~and the electricity provider's total number of net metering customers~~. The Commission shall maintain the reports required by this Section on the Commission's website.

Staff does not recommend adoption of the AG's and CUB/ELPC's recommendation detailing Staff's responsibilities with respect to maintaining the Commission website, nor does Staff recommend that the rule include provisions directing Staff to summarize the electricity suppliers' annual reports. Parties who wish to analyze the data contained in the reports will have the information available to them.

Regarding the AG's and CUB/EDF's recommendation to add a new subsection 465.40(b) concerning confidential data, in Staff's opinion the data required by Section 465.45 is not expected to engender requests for confidential treatment. Additionally, any reporting entity may seek redaction of information deemed by the Commission to be confidential. 220 ILCS 5/16-107.5(k).

C. SECTION 465.50 ELECTRICITY PROVIDER BILLING FOR ELIGIBLE CUSTOMERS

ComEd argues certain changes should be made to reflect revisions to Section 16-107.5(e) of the Act. ComEd Initial Comments at 5, Appendix at 10. This Section refers to Type (e) customers whose delivery service is kilowatt-based and whose supply service has not been declared competitive. Staff's understanding is that currently there are no residential Type (e) customers.

ComEd recommends the insertion of a phrase in subsection 465.50(c)(3) that includes the words "customer's supply service rate." However, the language in Section 16-107.5(e) refers to a customer's "electric service rate," not its "supply service rate." Staff does not recommend adoption of ComEd's modification, but would not object to modifying the subsection to include the language of Section 16-107.5(e); i.e., the term "electric service rate."

ComEd also recommends an additional modification of subsection 465.50(c)(3), as follows: …"that reflects the kilowatt-hour based charges, if any, in the customer's ~~for~~ delivery service rate"… As noted above, there are no Type (e) residential customers, so ComEd's suggested addition would not currently have applicability. However, it is possible in the future that delivery service charges will not be entirely kilowatt-hour based. Thus, with a small modification (i.e., deleting the word "rate"), Staff does not oppose ComEd's recommendation. With each of these changes, subsection 465.50(c)(e) would appear as follows:

3) If a customer is a net seller of electricity during the billing period, the customer shall receive a 1:1 kilowatt hour credit that reflects the kilowatt-hour based charges in the customer's electric service rate from the electricity supplier that is equal to the net kilowatt hours supplied by the

> customer during the billing period. To the extent that the electric utility is not the electricity supplier, the customer shall receive a 1:1 kilowatt hour credit that reflects the kilowatt-hour based charges, if any, for delivery service from the electric utility that is equal to the net kilowatt hours delivered to the electric utility's system by the customer during the billing period.

Additionally, ComEd proposes changing the term "electricity provider" to "electricity supplier" in subsection 465.50(d)(2) and (d)(4). ComEd Initial Comments, Appendix at 11. Staff does not oppose these changes.

D. SECTION 465.70 PENALTY PROVISIONS

Staff agrees with ComEd's proposed change to subsection 465.70(a)(2), which should read: "require an electricity provider to make due reparations or refunds as permitted by statute." ComEd Initial Comments at 5.

E. SECTION 465.80 MISCELLANEOUS PROVISIONS

ComEd proposes to change the term "electricity provider" to "electricity supplier." ComEd Initial Comments at 14. Staff urges the Commission to maintain the term "electricity provider," as it allows for either the entity supplying or delivering electricity to enter into arm's length agreements with net metering customers related to the renewable energy credits. *See* Draft Rule at 14; ComEd Initial Comments, Appendix at 14. Importantly, customers will accrue renewable energy credits for both supply and delivery, but if ComEd's proposed change is adopted, only renewable energy supply credits would be contemplated by this subsection. Moreover, the statute is clear that "this subsection (g) shall not be construed to prevent an arms-length agreement between an electricity *provider* and an eligible customer that sets forth the ownership of title of the credits." 220 ILCS 5/16-107.5(g) (emphasis added). Therefore, the Commission should ignore ComEd's proposed edit to the Draft Rule.

F. SECTION 465.90 METER AGGREGATION

Subsection 465.90 of the Draft Rule states:

a) Electricity suppliers shall separately consider each application for meter aggregation for the purposes of net metering and shall determine whether to allow meter aggregation for purposes of net metering on the basis of the facts and circumstances presented in each application.

b) Whenever an electricity supplier determines that it will not allow meter aggregation for the purposes of net metering, the electricity supplier shall provide an explanation of its determination, based on the facts and circumstances presented in the application, in a written document simultaneously filed with the Chief Clerk of the Commission and provided to the applicant, within 30 days after receiving the application.

RESA argues this subsection "goes far beyond the requirements of Section 16-107.5(l) . . . [and that t]here has been no justification for the additional burdens regarding meter aggregation created by proposed Section 465.90." RESA Initial Comments at 2-3. ComEd similarly argues the Draft Rule is "inconsistent" with, and "imposes obligations that are not required under Section 16-107.5(l)". ComEd Initial Comments at 5-6. Ultimately, both RESA and ComEd argue the entire subsection should be omitted from the Draft Rule. *Id.* at 3. Staff disagrees.

The Draft Rule is based on a reasonable interpretation of the statute and provides the necessary details of the statutory requirement. "The legislature may establish broad guidelines, and the details of application of these principles to specific instances may then be determined by an administrative body." *Lake County Board of Review v. The Property Tax Appeal Board of the State of Illinois*, 119 Ill. 2d 419, 427 (1988). "Reasonable discretion as to the manner of executing a law is often necessarily given to administrative officers." *Id.*; *see Dept. of Finance v. Cohen*, 369 Ill. 510 (1938). When a statute is ambiguous, courts will defer to any reasonable interpretation of the statute made by the

administrative agency interpreting that statute. *Chevron U.S.A., Inc. v. Natural Resources Defense Council, Inc.*, 467 U.S. 837, 844 (1984); *holding* "Sometimes the legislative delegation to an agency on a particular question is implicit rather than explicit. In such a case, a court may not substitute its own construction of a statutory provision for a reasonable interpretation made by the administrator of an agency."

The Draft Rule details the application of the principles established by the statute, based upon a reasonable interpretation of the statutory language. Section 16-107.5(l) requires all electricity providers to consider meter aggregation. 220 ILCS 5/16-107.5(l). The Draft Rule provides guidance as to the Commission's reasonable interpretation of a detailed application of the statutory requirement, and should remain in the Commission's Draft Rule as drafted. *See Lake County Board of Review*, 119 Ill. 2d at 427. Specifically, subsection 465.90 merely requires electricity providers to consider each application for meter aggregation separately, make a determination for each case based on the particular facts and circumstances, and to provide an explanation of its determination to both the applicant and the Commission. Draft Rule at 15.

ComEd also argues that the word "consider," which appears in Section 16-107.5(l), should be read in the singular. ComEd Initial Comments at 7. Staff respectfully observes that the singular and plural forms of the verb "consider" are the same. *See* "consider." *Merriam-Webster.*com. Merriam-Webster, 2015. Web. 16 July 2015. Therefore, as used, the word "consider" is ambiguous in the Act. 220 ILCS 5/16-107.5(l). The Commission may reasonably interpret the word "consider" to be either the singular or plural form, and as discussed above, courts will uphold any reasonable interpretation of an ambiguous statute by an administrative agency. *Chevron, U.S.A., Inc. v. NRDC*, 467 U.S. 837, 843,

104 S.Ct. 2778, 2782 (1984). The Draft Rule reasonably interprets the term in the plural form, and Staff recommends the Commission continue doing so.

Finally, ComEd argues that "the same rules" should apply to all net metering applicants, and therefore, the Commission should not require an explanation of why an application for meter aggregation was denied. ComEd Initial Comments at 8. First, ComEd's premise that an entity may simply deny net metering for non-meter aggregations without an explanation is incorrect. The statute and Draft Rule are very clear that electricity providers *must* allow net metering for eligible customers as long as the 5% cap has not been met. *See, generally,* 220 ILCS 5/16-107.5. To the extent net metering was denied, the electricity provider would have to have made specific considerations, which the Commission could verify, in making its determination. *See id.* This is not the case for meter aggregation. 220 ILCS 5/16-107.5(l). Moreover, the General Assembly has indicated that the Commission should treat meter aggregation applications differently than other types of net metering applications. *See id.* The statute is clear that the definition of eligible customers in subsection (b)(i) must not be read to limit the requirements of subsection (l). *Id.*; "notwithstanding the definition of 'eligible customer' in item (i) of subsection (b) of this Section." Additionally, subsection (l) makes it clear a different group of customers are considered to be "eligible customers" for purposes of meter aggregation. *Id.;* "for the types of eligible customers described in this Section." Therefore, the Commission should continue to treat this different type of net metering differently, and to the extent the Draft Rule does that, there is nothing improper in doing so.

CUB/EDF requests that the explanations contemplated under this subsection be posted publicly by the Commission and makes certain proposed language changes to the

subsection. CUB/EDF Initial Comments at 5-6. First, Staff recommends that should the Commission determine these explanations be posted publicly, it should be done by the electricity suppliers making the decisions themselves. This would accomplish the CUB/EDF purpose without involving the Commission, which would only be unnecessarily inserted into the electricity suppliers' process at added cost to the Commission, should the CUB/EDF proposal be adopted.

Second, CUB/EDF suggests, among other things, that the term "electricity supplier" should be changed to "electricity provider" throughout this subsection. *Id.* Essentially, "electricity supplier" refers to the entity actually supplying the customer with electricity, while "electricity provider" is a broad term that refers to both the entity supplying electricity *and* the entity delivering the electricity; these terms could refer to one single entity or two separate entities, based on the specific customer's situation. *See* Draft Rule at 2. It would be inappropriate for an entity merely delivering electricity to make the determination contemplated in subsection 465.90. As such CUB/EDF's proposed modification should be rejected. This is true despite the statutory language in Section 16/107.5(l), which refers to "electricity provider." If both the entity delivering and the entity supplying electricity were to make a determination pursuant to this subsection, then there could be customers for whom meter aggregation is permissible for supply purposes, but not delivery, and vice versa. This would led to an absurd result, as customers must have meter aggregation approved for both delivery and supply for meter aggregation to take place. Statutes must be interpreted to avoid impractical or absurd results. *Commonwealth Edison Co. v. Illinois Commerce Comm'n*, 2014 IL App (1st) 132011, ¶ 26, 16 N.E.3d 801, 809-10, *appeal denied*, 21 N.E.3d 713 (Ill. 2014), citing *Nowak v. City of Country Club*

Hills, 2011 IL 111838, ¶ 21, 354 Ill. Dec. 825, 958 N.E.2d 1021. Thus, the possibility that different entities could make different determinations, effectively rendering the other determination meaningless, should be avoided.

Similarly, ComEd argues that the rule should recognize that a supplier's decision to allow meter aggregation should not require a delivery service provider to provide delivery service credit. ComEd Initial Comments at 9. ELPC points out in its Initial Comments that "ComEd has responded [to net metering inquiries] with, since they are not supply[ing] the power, they are not the company responsible for setting up the new metering." ELPC Initial Comments, Attach. 3 at 3. While ComEd has not made this argument in this docket, the logical conclusion of this statement is that when an electric utility that only provides delivery service to a customer, it is not supplying the power and therefore, that electric utility should have no responsibility or authority to determine the metering of the customer, including whether the customer may participate in meter aggregation. *See id.* Additionally, that electric utility should not be able to disclose delivery service credits, or circumvent the otherwise applicable statutory and regulatory guidelines as to taxes, fees, and delivery service charges, as ComEd proposes to do.

As such, the Commission should maintain this subsection in the Draft Rule as originally drafted.

III. CONCLUSION

Staff recommends that the Commission approve Staff's modifications to the First Notice Order made herein.

Respectfully submitted,

__/s/_____

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Counsel for the Staff of the Illinois Commerce Commission

TITLE 83: PUBLIC UTILITIES
CHAPTER I: ILLINOIS COMMERCE COMMISSION
SUBCHAPTER c: ELECTRIC UTILITIES

PART 465
NET METERING

Section

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AUTHORITY: Implementing Section 16-107.5 of the Public Utilities Act [220 ILCS 5/16-107.5] and authorized by Sections 16-107.5 and 10-101 of the Public Utilities Act [220 ILCS 5/16-107.5, 220 ILCS 5/10-101].

SOURCE: Emergency rules adopted at 32 Ill. Reg. 202, effective December 22, 2007, for a maximum of 150 days; adopted at 32 Ill. Reg. 8116, effective May 15, 2008; amended at 39 Ill Reg. _____, effective _____.

Section 465.5 Definitions

Terms defined in Section 16-102 of the Public Utilities Act (Act) [220 ILCS 5/16-102] shall have the same meaning for purposes of this Part as they have under Section 16-102 of the Act, unless further defined in this Part.

"Alternative retail electric supplier" or "ARES" has the meaning set forth in Section 16-102 of the Act.

"Annual period" means the period of 12 consecutive monthly billing periods ending on the last day of either the net metering customer's April monthly billing period or its October monthly billing period, whichever was selected by the customer in connection with its application for net metering.

"Arm's-length Agreement" means an agreement negotiated by unrelated parties, each acting in his or her own self-interest. "Arm's-length Agreement" shall not include any standardized agreement offered to consumers of goods or services that does not afford the consumer a realistic opportunity to bargain and [is offered] under such conditions that the consumer cannot obtain the desired product or service except by acquiescence in the standardized agreement.

"Avoided costs" means the incremental costs to the electricity provider of electric energy or capacity or both, which, but for the purchase from an eligible customer, the electricity provider would generate itself or purchase from another source.

"Electric utility" means a public utility, as defined in Section 5/3-105 [220 ILCS 5/3-105] of the Act, that has a franchise, license, permit or right to furnish or sell electricity or light, except when used solely for communications purposes, to retail customers within a service area, as both of these terms are defined in Section 5/16-102 of the Act.

"Electricity provider" means an electric utility~~, whether providing services within or outside of its service area,~~ or an alternative retail electric supplier.

"Electricity supplier" means the net metering customer's electric supply provider, the electric utility providing electric supply services either within or outside of its service area, or the alternative retail electric supplier that is providing electric supply services.

"Eligible customer" or "customer" means a retail customer that owns or operates a solar, wind, or other eligible renewable electrical generating facility with a rated capacity of not more than ~~up to~~ 2,000 kilowatts that is located on the customer's premises and is intended primarily to offset the customer's own electrical requirements.

"Eligible renewable electrical generating facility" means a generator or generators with a total rated capacity of not more than ~~up to~~ 2,000 kilowatts powered by solar electric energy, wind, dedicated crops grown for electricity generation, agricultural residues, untreated wood waste and unadulterated wood waste, landscape trimmings, livestock manure, anaerobic digestion of livestock waste or anaerobic digestion of food processing waste, fuel cells powered by renewable fuels or microturbines powered by renewable fuels, or hydroelectric energy.

"Net electricity metering" or "net metering" means measurement during the billing period applicable to an eligible customer of the net amount of electricity supplied by an electricity provider to the customer's premises or provided to the electricity provider by the customer.

"Net purchaser of electricity" means that the total amount of generation produced by the customer is less than the customer's total usage during an ~~the~~ applicable billing period.

"Net seller of electricity" means that the total amount of generation produced by the customer is greater than the customer's total usage during an ~~the~~ applicable billing period.

"Non-competitive customer" means an eligible customer whose class of electric service had not been declared competitive pursuant to Section 16-113 of the Act prior to July 1, 2011, including:

all residential retail customers;

all non-residential retail customers with peak demands of less than 100 kilowatts if located in the service territory of an electric utility serving at least three million retail customers; and

all non-residential retail customers with peak demands of less than 150 kilowatts if located in the service territory of an electric utility serving at least one million retail customers.

"Time of use rate" means any contract or tariff under which the kWh price for electric power and energy supply is not uniform over all of the hours in a billing period.

"Type (d) Customer" means an eligible, non-competitive customer whose electric delivery service is provided and measured on a kilowatt-hour basis and whose electric supply service is not based on hourly pricing.

"Type (d-5) Customer" means an eligible, non-competitive customer whose electric delivery service is provided and measured on a kilowatt-hour basis and whose electric supply service is based on hourly pricing.

"Type (e) Customer" means an eligible, non-competitive customer whose electric delivery service is provided and measured on a kilowatt demand basis and whose electric supply service is not based on hourly pricing.

"Type (f) Customer" means an eligible customer who is not a Type (d) Customer, Type (d-5) Customer or Type (e) Customer.

(Source: Amended at 39 Ill. Reg. _____, effective _____)

Section 465.10 Application of Part 465

This Part shall apply to all Illinois electric utilities and alternative retail electric suppliers as defined in the Act ~~that are required to provide net metering services~~ in accordance with Section 16-107.5 of the Act [220 ILCS 5/16-107.5].

(Source: Amended at 39 Ill. Reg. _____, effective _____)

Section 465.35 Net Metering Application and Enrollment Procedures

a) Each electricity supplier ~~provider~~ shall establish an application form and publish on its website procedures to enable eligible customers to participate in the net metering program offered by the electricity supplier ~~provider~~. Each electricity supplier ~~provider~~ shall designate a point of contact and provide contact information on its website. The point of contact shall be able to direct questions concerning net metering request submissions and the net metering process to knowledgeable individuals within the company.

b) An electricity supplier ~~provider~~ may establish an enrollment cap of 5~~1~~% of the peak demand supplied by the electricity supplier ~~provider~~ in the previous calendar year in accordance with Section 16-107.5(j) of the Act. Nothing in this Part alters the authority of electricity suppliers ~~providers~~ to offer net metering beyond the limitations in Section 16-107.5(j) of the Act, if they so choose. ~~Applicable electric utilities (e.g., Illinois Power Company, Central Illinois Light Company, Central Illinois Public Service Company, Commonwealth Edison Company and MidAmerican Energy Company) shall limit the number of eligible customers with generators that have a nameplate rating of 40 kilowatts and below to 200 new billing accounts until March 31, 2009.~~

~~c) Each electricity provider shall establish an open enrollment period to receive net metering applications during the first month that net metering is available. If an electricity provider receives applications in excess of any applicable limits set forth in subsection (b), that provider shall determine enrollment priority by lottery. Applications will not be accepted prior to the start of the open enrollment period. This subsection does not prohibit an electricity provider from providing an initial preference for customers that are already participating in net billing or other programs similar to net metering that are offered by that provider.~~

~~c~~d~~)~~ ~~After the end of the open enrollment period, or after any applicable limit provided for in subsection (b) has been met, whichever comes first, net~~ Net metering enrollment priority shall be established on a first-come, first-served basis, according to an electricity supplier's ~~provider's~~ date stamp or similar electronic

method for indicating receipt of a completed net metering application. ~~Applicants that applied during the open enrollment period that did not establish enrollment priority during the open enrollment period shall have their enrollment priority established in accordance with this subsection (d) based upon the date stamp of the application submitted during the open enrollment period.~~

d~~e~~) Each completed application for net metering services shall be in writing or be submitted via an electronic application process established by the electricity supplier and shall include:

1) The customer's name, contact information and corresponding service location where the proposed net metering generation facility or facilities are located;

2) The name plate capacity rating of the proposed net metering generation facility or facilities; and

3) Sufficient information to permit the electricity supplier ~~provider~~ to determine whether any facility on the application qualifies as an eligible renewable electrical generating facility.

e~~f~~) Electricity suppliers ~~providers~~ shall provide net metering applicants with a single ~~point~~ mailing address ~~for all net metering applications~~ to which a completed physical application must be sent. In addition, or as an alternative, electricity suppliers ~~providers~~ may establish an electronic net metering application process. Electricity suppliers ~~providers~~ shall date-stamp, either physically or by electronic means, each completed application upon receipt and render a completeness determination. Upon receipt of a completed and executed application, electricity suppliers ~~providers~~ shall, within 10 business days after receipt of an application or completion of an open enrollment period, notify an applicant as to whether it is authorized to participate in the electricity supplier's ~~provider's~~ net metering program. An electricity supplier ~~provider~~ shall state, in writing, its reasons for denying a prospective net metering customer's application. An electricity supplier ~~provider~~ shall not deny a prospective net metering customer's application in a manner that violates this Part, 83 Ill. Adm. Code 466 or Section 16-107.5 of the Act.

f~~g~~) If an electricity supplier ~~provider~~ denies an application due to the cap provided for in subsection (b), the electricity supplier ~~provider~~ shall offer the applicant the opportunity to be placed on a waiting list. If space becomes available under the cap, due to either attrition among enrolled customers or an increase in the electricity supplier's ~~provider's~~ peak demand, wait-listed customers shall be processed before new applications.

g~~h~~) Any authorization to net meter shall remain effective for as long as the customer remains eligible for net metering and continues taking electric supply ~~generation~~ service from the electricity supplier ~~provider~~, subject to the limitations in subsections (g~~h~~)(1) and (g~~h~~)(2).

1) A customer authorized to net meter under subsection (e~~f~~) shall submit an executed application for interconnection, pursuant to 83 Ill. Adm. Code 466, to the electric utility within 30 business days after the date of the notification from the electricity supplier ~~provider~~ pursuant to subsection (e~~f~~). An electricity supplier ~~provider~~ may cancel the authorization if the customer has not submitted an executed application by the required date.

2) The following provisions apply to any electricity supplier ~~provider~~ that establishes enrollment limits, as provided for in subsection (b):

A) The electricity supplier ~~provider~~ shall ~~may~~ cancel a customer's authorization to net meter if the customer has not executed and returned to the customer's electric utility an interconnection agreement with the electric utility pursuant to 83 Ill. Adm. Code 466 and provided the executed interconnection agreement to its electricity supplier ~~with the customer's electric utility~~ within 12 months after receiving the interconnection agreement from the electric utility.

B) The electricity supplier ~~provider~~ must automatically extend the authorization to net meter by an additional six months for an eligible customer that has executed and returned to the customer's electric utility an interconnection agreement within 12 months after receiving the interconnection agreement from the electric utility, but whose eligible renewable electrical generating facility has not commenced operation and passed any applicable witness test.

C) A customer seeking to extend the authorization to net meter for an additional six months pursuant to subsection (g)(2)(B) must pay a deposit of $25 for each kilowatt of the nameplate rating of the customer's eligible renewable electrical generating facility, which shall be refunded only if the facility commences operation and passes any applicable witness test. A customer may only receive a single six-month extension.

D) Customers who have previously applied to net meter must reapply if:

i) the customer has had its authorization to net meter canceled for failure to execute and return to the customer's electric utility an interconnection agreement and provide the executed interconnection agreement to its electricity supplier within 12 months after receiving the interconnection agreement from the electric utility; or

ii) the customer has exhausted its allotted time to commence operation and pass any applicable witness test pursuant to subsections (g)(2)(B) and (g)(2)(C).

E) If a customer must reapply pursuant to subsection (g)(2)(D), all other customers awaiting authorization to net meter at that time shall be deemed to have applied before the reapplying customer for purposes of the enrollment priority established by subsection (c). Additionally, the project for which a customer must reapply shall be removed from the calculation of the 5% of peak demand supplied by the electricity supplier ~~provider~~ enrollment cap.

h~~i~~) With respect to any customer that has been authorized for net metering offered by an electricity supplier ~~provider~~ that is not the electric utility providing delivery service to the customer, the electricity supplier ~~provider~~ must notify the electric utility in writing or via an electronic method approved by the utility of the ~~a~~ customer's status as a net metering customer within 15 days after the customer's authorization.

i~~j~~) With respect to any customer that has had its authorization for net metering canceled by an electricity supplier ~~provider~~ that is not the electric utility providing delivery service to the customer, the electricity supplier ~~provider~~ must notify the electric utility in writing or via an electronic method approved by the utility of the customer's status as a canceled net metering customer within 15 days after the cancellation.

j) With respect to any non-competitive customer authorized for net metering offered by an electric supplier ~~utility~~ that is switching to another electric supplier ~~ARES~~, the electric utility must notify the customer’s new electric supplier ~~ARES~~ via an electronic method approved by the utility of the customer's status as a net metering customer.

k) With respect to any customer that has been authorized for net metering that is switching from one electricity supplier to another, the customer's new electricity

supplier shall inform the customer within 15 calendar days after the date the electric utility accepts the enrollment request of any steps that are necessary to apply for net metering with the new supplier.

(Source: Amended at 39 Ill. Reg. _____, effective _____)

Section 465.40 Reporting Requirements

The annual report required by Section 16-107.5(k) of the Act shall be filed electronically with the Chief Clerk ~~Manager of the Energy Division~~ of the Illinois Commerce Commission, in a manner that meets all filing requirements of the Commission's electronic filing system, by April 1 of each year ~~beginning in 2009~~. The report shall include all information required under Section 16-107.5(k) of the Act, including, but not limited to, the following information: the total number of net metering customers served ~~peak demand supplied~~ by the electricity provider; ~~during the previous year;~~ the type, capacity, and energy sources of the generating systems used by the electricity provider's net metering customers; whether the total generating capacity of the electricity provider's ~~its~~ net metering customers~~;~~ equals or exceeds the 5% cap; and, whether the electricity provider intends to limit the total generating capacity of its net metering customers to 5~~1~~%~~; and the electricity provider's total number of net metering customers~~. The Commission shall maintain the reports required by this Section on the Commission's website.

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(Source: Amended at 39 Ill. Reg. _____, effective _____)

Section 465.50 Electricity Provider Billing for Eligible Customers

a) Billing for Type (d) Customers

1) The electricity supplier shall determine whether each customer is a net purchaser of electricity or a net seller of electricity during the billing period.

2) If a customer is a net purchaser of electricity during the billing period, the electricity supplier shall assess charges on the net amount purchased at the tariffed or contract rate, as appropriate, under which the customer is taking service from the electricity supplier. To the extent that the electric utility is not the electricity supplier, the electric utility shall assess charges for delivery and other provided services at the tariffed rate under which the customer is taking electric service from the electric utility. Notwithstanding the above, the tariffed or contract rates for both electric supply and delivery services shall be non-discriminatory rates that are

identical, with respect to rate structure, retail rate components, and any monthly charges, with the rates that the customer would be charged if not a net metering customer, unless an electricity supplier and the customer have entered into an arm's-length agreement setting forth different prices, terms, and conditions for the provision of net metering service.

3) If a customer is a net seller of electricity during the billing period, the customer shall receive a 1:1 kilowatt hour credit from the electricity supplier that is equal to the net kilowatt hours supplied by the customer during the billing period. To the extent that the electric utility is not the electricity supplier, the customer shall receive a 1:1 kilowatt hour credit for delivery service from the electric utility that is equal to the net kilowatt hours delivered to the electric utility's system by the customer during the billing period.

4) Any credits received by the customer shall be carried over to subsequent billing periods. Unused credits shall expire either at the end of the annual period or, in the event the customer terminates service from the electricity supplier, at the time the customer terminates service from the electricity supplier.

5) Customers remain responsible for all taxes, fees, and utility delivery charges that would otherwise be applicable to the net amount of electricity used by the customer.

b) Billing for Type (d-5) Customers

1) The electricity supplier shall determine whether each customer is a net purchaser of electricity or a net seller of electricity during each discrete time period for which the tariffed or contract rate, as appropriate, is applicable.

2) For the discrete time periods in which the customer is a net purchaser of electricity, the electricity supplier shall charge the customer for the net electricity supplied to and used by the customer according to the terms of the contract or tariff to which the same customer would be assigned or be eligible if the customer were not a net metering customer.

3) For the discrete time periods in which the customer is a net seller of electricity, the customer shall receive a credit that consists of an energy credit and a delivery credit. The energy credit for a discrete time period shall be determined by multiplying the net electricity supplied during the discrete time period by the same price per kilowatt hour as the electric

service provider would charge for kilowatt-hour energy sales during that same time period. The delivery credit shall be determined by multiplying the net electricity supplied during the discrete time period by a credit that reflects all kilowatt-hour-based electricity charges applicable to the customer electric service rate, excluding energy charges, for that discrete time period. When eligible customers receive service under an electric utility's bundled service rates, the monetary credit shall be equal to the applicable kilowatt-hour-based bundled service charges, multiplied by the net electricity supplied over the billing period. The electricity supplier shall provide the energy credit, and if the electricity supplier is also the electric utility, then it shall also provide the delivery credit. If the electricity supplier is not the electric utility, the credit for delivery services shall be provided by the electric utility.

4) Customers remain responsible for all taxes, fees, and utility delivery charges that would otherwise be applicable to the net amount of electricity supplied to the eligible customer by the electricity provider.

c) Billing for Type (e) Customers

1) The electricity supplier shall determine whether each customer is a net purchaser of electricity or a net seller of electricity during the billing period.

2) If a customer is a net purchaser of electricity during the billing period, the electricity supplier shall assess charges on the net amount purchased at the tariffed or contract rate, as appropriate, under which the customer is taking service from the electricity supplier. To the extent that the electric utility is not the electricity supplier, the electric utility shall assess charges for delivery and other provided services at the tariffed rate under which the customer is taking electric service from the electric utility. Notwithstanding the above, the tariffed or contract rates for both electric supply and delivery services shall be non-discriminatory rates that are identical, with respect to rate structure, retail rate components, and any monthly charges, with the rates that the customer would be charged if not a net metering customer, unless an electricity supplier and the customer have entered into an arm's-length agreement setting forth different prices, terms, and conditions for the provision of net metering service.

3) If a customer is a net seller of electricity during the billing period, the customer shall receive a 1:1 kilowatt hour credit that reflects the kilowatt-hour based charges in the customer's electric service rate from the electricity supplier that is equal to the net kilowatt hours supplied by the

customer during the billing period. To the extent that the electric utility is not the electricity supplier, the customer shall receive a 1:1 kilowatt hour credit that reflects the kilowatt-hour based charges, if any, for delivery service from the electric utility that is equal to the net kilowatt hours delivered to the electric utility's system by the customer during the billing period.

4) Any credits received by the customer shall be carried over to subsequent billing periods. Unused credits shall expire either at the end of the annual period or, if the customer terminates service from the electricity supplier, at the time of the termination.

5) Customers remain responsible for all taxes, fees, and utility delivery charges that would otherwise be applicable to the net amount of electricity used by the customer.

d) Billing for Type (f) customers

1) The electricity supplier shall determine whether the customer is a net purchaser of electricity or a net seller of electricity during each discrete time period. For each discrete time period, the electricity supplier shall multiply the applicable rate to the amount purchased or sold by the customer to determine each discrete time period's charge or credit. These amounts shall be summed to determine the net energy charge or credit for each billing period.

2) If the customer is a net purchaser of electricity during the billing period, the electricity supplier shall apply the applicable tariffed or contract rate, as applicable, to the net amount purchased. If the customer is a net seller of electricity, the electricity supplier shall compensate the customer for any excess kilowatt hour credits at the electricity provider's avoided cost of electricity supply over the monthly period or as otherwise specified by the terms of a power-purchase agreement negotiated between the customer and electricity supplier ~~provider~~. For purposes of calculating the customer's electricity bill, any resulting credits may be used to offset other charges assessed by the electricity supplier.

3) The electricity supplier shall not establish any unreasonable differences in net metering customers' prices, terms, conditions, services, products, or facilities as between localities.

4) For the purpose of calculating the customer's bill, any compensation to the customer may be used to offset other charges assessed by the electricity suppliers ~~providers~~.

5) Customers remain responsible for all taxes, fees, and utility delivery charges that would otherwise be applicable to the gross amount of electricity supplied to the eligible customer by the electricity supplier.

~~a) Billing for all residential customers and non-residential customers with generators no greater than 40kW~~

~~1) Customers taking services under rates other than time of use rates~~

~~A) The electric utility shall determine whether the customer is a net purchaser of electricity or a net seller of electricity during the billing period.~~

~~B) If the customer is a net purchaser of electricity during the billing period, the electricity provider shall assess charges on the net amount purchased at the tariffed or contract rate, as appropriate, under which, the customer is taking service from the electricity provider. To the extent that the electric utility is not the electricity provider, the electric utility shall assess charges for delivery and other provided services at the tariffed rate under which the customer is taking electric service from the electric utility.~~

~~C) If the customer is a net seller of electricity, the customer shall receive a credit from the electricity provider that is equal to the net kilowatt-hours supplied by the customer during the billing period. To the extent that the electric utility is not the electricity provider, the customer shall receive a credit for delivery service from the electric utility that is equal to the net kilowatt-hours delivered to the electric utility's system by the customer during the billing period. Any credits received by the customer will be carried over to subsequent billing periods. Unused credits will expire at the end of the annual period or earlier in the event the customer terminates service from the electricity provider.~~

~~2) Customers taking service under time of use rates~~

~~A) The electric utility shall determine whether the customer is a net purchaser of electricity or a net seller of electricity during each discrete time period for which the tariffed or contract rate for~~

~~electricity supply, as appropriate, is applicable. For each time period, the electricity provider shall multiply the tariffed or contract rate for electricity supply, as appropriate, by the amount purchased or sold by the customer to determine each time period's charge or credit. These amounts shall be summed to determine the net energy charge or credit for the billing period.~~

~~B)~~ ~~If the customer is a net purchaser of electricity, the customer will remain responsible for all taxes, fees and utility delivery charges that would otherwise be applicable to the net amount of electricity used by the customer.~~

~~C)~~ ~~If the customer is a net seller of electricity, the customer shall receive a monetary credit from the electricity provider that is equal to the energy credit determined for the billing period, plus kilowatt-hour based delivery charges multiplied by the net energy supplied over the billing period. When eligible customers receive service under an electricity provider's bundled service rates, the monetary credit shall be equal to the applicable kilowatt-hour based bundled service charges, multiplied by the net energy supplied over the billing period. In the event that the electricity provider is not the electric utility, the monetary credit for delivery service shall be provided by the electric utility. Any monetary credits received by the customer will be carried over to subsequent billing periods. Unused credits will expire at the end of the annual period or earlier in the event that the customer terminates service from the electricity provider. For purposes of calculating the customer's electricity bill, any credits may be used to offset other charges assessed by the electricity provider.~~

~~b)~~ ~~Billing for non-residential eligible customers with generators over 40 kW and no greater than 2,000 meters~~

~~1)~~ ~~Customers taking service under rates other than time of use rates~~

~~A)~~ ~~The electric utility shall determine whether the customer is a net purchaser of electricity or a net seller of electricity during the billing period. If the customer is a net purchaser of electricity during the billing period, the electricity provider shall apply the applicable tariffed or contract rate, as applicable, to the net amount purchased. If the customer is a net seller of electricity, the electricity provider shall compensate the customer at the electricity provider's avoided cost of electricity supply. For purposes of~~

~~calculating the customer's electricity bill, any resulting credits may be used to offset other charges assessed by the electricity provider.~~

~~B)~~ ~~The electric utility shall assess delivery charges, fees and taxes on the gross amount of electricity supplied to the eligible customer, regardless of whether the eligible customer is a net purchaser or a net seller. When an eligible customer receives service under an electricity provider's bundled service rates, delivery charges shall be the applicable bundled service rate under which that customer purchases electric service. For the purposes of calculating the customer's bill, any compensation to the customer may be used to offset other charges assessed by the utility.~~

~~2)~~ ~~Non-residential customers taking service under time of use rates~~

~~A)~~ ~~The electric utility shall determine whether the customer is a net purchaser of electricity or a net seller of electricity during each discrete time period. For each time period, the electricity provider shall multiply the applicable rate to the amount purchased or sold by the customer to determine each time period's charge or credit. These amounts shall be summed to determine the net energy charge or credit for each billing period.~~

~~B)~~ ~~The electric utility shall assess delivery charges, fees and taxes on the gross amount of electricity supplied to the eligible customer, regardless of whether the eligible customer is a net purchaser or a net seller. In the case of an eligible customer receiving service under an electricity provider's bundled service rates, delivery services charges shall be the applicable bundled service rate under which the customer purchases electric services. For the purpose of calculating the customer's bill, any compensation to the customer may be used to offset other charges assessed by the electric utility.~~

(Source: Amended at 39 Ill. Reg. _____, effective _____)

Section 465.55 Interval Meter Data

The electric utility shall provide interval meter data to the customer's electricity supplier when the information is necessary for the electricity supplier's billing purposes.

(Source: Added at 39 Ill. Reg. _____, effective _____)

Section 465.70 Penalty Provisions

a) Upon complaint or on the Commission's own motion, the Commission may conduct an investigation of an electricity provider's actions under any Section of this Part. The Commission may, after notice and hearing:

1) order an electricity provider to cease and desist or correct any violation of, or nonconformance with, any provision of this Part;

2) require an electricity provider ~~utility provider~~ to make due reparations or refunds as permitted by statute;

3) impose financial penalties for violations of, or non-conformance with, the provisions of this Part as permitted under the Act;

4) take other remedial and preventive action as provided for under the Act.

b) These remedies shall be cumulative and may be imposed in addition to other remedies that the Commission may have the authority to impose.

(Source: Amended at 39 Ill. Reg. _____, effective _____)

Section 465.80 Miscellaneous Provisions

a) In accordance with Section 16-107.5~~(e) and~~ (g) of the Act, nothing in this Part is intended to prevent an arm's-length agreement between an electricity provider and an eligible customer ~~that either sets forth different prices, terms and conditions for the provision of net metering service, including, but not limited to the provision of the appropriate metering equipment for non-residential customers, or~~ that sets forth the ownership or title of renewable energy credits.

b) In accordance with Section 16-107.5(m) of the Act, nothing in this Part is intended to affect any ~~existing~~ retail contract between an alternative retail electric supplier and an eligible customer existing prior to the effective date of this Part.

~~b) Nothing in this Part shall be construed to impose upon an alternative retail electric supplier any additional obligation that it does not otherwise have pursuant to the Act.~~

(Source: Amended at 39 Ill. Reg. _____, effective _____)

Section 465.90 Meter Aggregation

a) Electricity suppliers shall separately consider each application for meter aggregation for the purposes of net metering and shall determine whether to allow meter aggregation for purposes of net metering on the basis of the facts and circumstances presented in each application.

b) Whenever an electricity supplier determines that it will not allow meter aggregation for the purposes of net metering, the electricity supplier shall provide an explanation of its determination, based on the facts and circumstances presented in the application, in a written document simultaneously filed with the Chief Clerk of the Commission and provided to the applicant, within 30 days after receiving the application.

(Source: Added at 39 Ill. Reg. _____, effective _____)

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission On Its Own Motion	)))	Docket No. 15-0273
	))	
Amendment of 83 Ill. Adm. Code 465	)	

VERIFICATION OF DR. ERIC P. SCHLAF

State of Illinois)
)
County of Sangamon)

I, Dr. Eric P. Schlaf, Senior Economic Analyst in the Policy Division of the Illinois Commerce Commission, being first duly sworn upon oath, state that I am familiar with the facts and matters set forth in the forgoing Verified Reply Comments of the Staff of the Illinois Commerce Commission, and that the same are true and correct to the best of my knowledge, information and belief.

Dr. Eric P. Schlaf

Subscribed and sworn to before me
this 22nd day of July, 2015.

NOTARY PUBLIC

OFFICIAL SEAL
LISA BOWMAN
Notary Public - State of Illinois
My Commission Expires Dec 9, 2015