

Distributed Generation – Frequently Asked Questions

Q: The Ameren Community Solar tariff uses different tables depending whether or not the project receives a “Customer Generation Rebate.” We request that Ameren change this to Distributed Generation Rebate for clarity and consistency with the Public Utilities Act, or that Ameren define “Customer Generation Rebate” to make clear it is in reference to the Distributed Generation Rebate available via 220 ILCS 5/16-107.6.

A: Ameren Illinois will soon file its tariffs to provide rebates to customers with qualifying inverters, and that tariff uses the “Customer Generation Rebate” naming convention and references the appropriate sections of the Public Utilities Act. Due to the deadline associated with filing the revised net metering tariff, and the lack of a deadline associated with filing the smart inverter rebate tariff, the rebate tariff development and filing understandably occurred after the filing of the net metering tariff.

Q: It appears Ameren’s tariff credits residential and small commercial customers with a kWh energy credit that rolls over month-to-month for up to a year, whereas C&I customers get a monetary credit that never expires. For small customers, the “year” begins in either April or October and unused credits expire at the end of the year. ComEd provides a monetary credit and it carries over indefinitely. There is also no annual period/set start time.

- ComEd uses the monetary credit to offset delivery charges.
- We prefer ComEd’s approach because it means a customer can take full advantage of their credits.
- Why does the C&I customer’s monetary credit not expire in Ameren’s program, but the residential and small commercial credit does?

The statute clearly says that utilities will provide a monetary credit^[1] so we request that all customers are provided a monetary credit that never expires.

[1] 1-75(c)(1)(M) of Public Act 99-0906 states, “Electric utilities shall provide a monetary credit to a subscriber’s subsequent bill for service for the proportional output of a community renewable generation project attributable to that subscriber as specified in Section 16-107.5 of the Public Utilities Act.”

A: Ameren’s net metering tariff and the compensation processes included in it are consistent with the provisions of the Public Utilities Act. Please refer to the Billing Matrix below for the legislative citations supporting the billing treatment provided to net metering customers.

Please note also that for customers in competitive service classes (i.e., DS-3 and DS-4, the C&I customers referred to above) there is no carry-forward of any excess generation.

I. NET METERING BILLING SCENARIO FOR CUSTOMERS INITIATING SERVICE UNDER RIDER NET METERING SUBSEQUENT TO JUNE 1, 2017 BUT PRIOR TO 5% THRESHOLD BEING REACHED

Type of NM Customer	Delivery Service Netted?	Delivery Service Netting Carried to Anniversary Date?	Supply Service Netted?	Supply Service Netting Carried to Anniversary Date?	FEJA Citation Supporting Billing Treatment	Tariff Billing Methodology
Onsite – non-competitive; fixed rate; no rebate.	Yes	Yes	Yes	Yes	p260; lines 2-26; p261; lines 1-8.	A
Onsite – non-competitive; fixed rate; received rebate.	No	N/A	Yes	Yes	p281; lines 6-11.	C
Subscriber – non-competitive; fixed rate.	No	N/A	Yes	Yes	p269; lines 11-19.	C
Onsite – non-competitive; hourly; no rebate.	Yes	Yes	Yes	Yes	p261; lines 8-26; p262; lines 1-11.	A
Onsite – non-competitive; hourly; received rebate.	No	N/A	Yes	Yes	p281; lines 6-11.	C
Subscriber – non-competitive; hourly.	No	N/A	Yes	Yes	p269; lines 11-19.	C
Onsite – competitive; regardless of rebate.	No	N/A	Yes	No	p269; lines 11-19.	B
Subscriber – competitive.	No	N/A	Yes	No	p269; lines 11-19.	B

II. NET METERING BILLING SCENARIO FOR CUSTOMERS INITIATING SERVICE UNDER RIDER NET METERING SUBSEQUENT TO 5% THRESHOLD BEING REACHED

Type of NM Customer	Delivery Service Netted?	Delivery Service Netting Carried to Anniversary Date?	Supply Service Netted?	Supply Service Netting Carried to Anniversary Date?	FEJA Citation Supporting Billing Treatment	Tariff Billing Methodology
Onsite – non-competitive; fixed rate; regardless of rebate.	No	N/A	Yes	Yes	p273; lines 9-26; p274; lines 1-17.	C
Subscriber – non-competitive; fixed rate.	No	N/A	Yes	Yes	p273; lines 9-26; p274; lines 1-17.	C
Onsite – non-competitive; hourly; regardless of rebate.	No	N/A	Yes	No	p267; lines 7-11; p274; lines 18-26; p275; lines 1-12.	B
Subscriber – non-competitive; hourly.	No	N/A	Yes	No	p267; lines 7-11; p274; lines 18-26; p275; lines 1-12.	B
Onsite – competitive; regardless of rebate.	No	N/A	Yes	No	p267; lines 7-11; p274; lines 18-26; p275; lines 1-12.	B
Subscriber – competitive.	No	N/A	Yes	No	p267; lines 7-11; p274; lines 18-26; p275; lines 1-12.	B

Q: Will Ameren Illinois share information about your interconnection queue?

A: Until most recently, Ameren Illinois did not have a queue. Unless two or more generators make application to interconnect on the same electric circuit, all applications are considered first in the queue – please see the *relevant excerpt* from Part 466 of the Illinois Administrative Code below:

Section 466.30 Definitions

"Queue position" means, for each distribution circuit or line section, the order of a completed interconnection request relative to all other pending completed interconnection requests on that distribution circuit or line section. It is established by the date that the EDC receives the completed interconnection request.

Interconnection applicants are notified of their position in the queue when their application request is complete – please see the relevant excerpt from Part 466 of the Illinois Administrative Code below:

Section 466.100 Level 2 Expedited Review

- b) *The Level 2 interconnection shall use the following procedures:*
- 1) *The applicant submits an interconnection request using the appropriate form and the Level 2 application fee (see Appendix C).*
 - 2) *Within 10 business days after receiving the interconnection request, the EDC shall inform the applicant as to whether the interconnection request is complete. If the request is incomplete, the EDC shall specify what materials are missing and the applicant has 10 business days to provide the missing information or the interconnection request shall be deemed withdrawn.*
 - 3) *After an interconnection request is deemed complete, the EDC shall assign a queue position based upon the date that the interconnection request is determined to be complete. The EDC shall then inform the applicant of its queue position.*

Q: : I was wondering if Ameren might be open to scheduling a call with stakeholders to discuss your interconnection queue, application process and related technical issues? I think it would be very helpful for developers who are considering projects in Ameren's territory. If you are not open to that at that time, or if it might take a while to plan, would you be willing to join a CCSA call with one of your technical engineers to provide an overview and answer questions?

A: Ameren is open to holding another webinar open to all of the registrants in the ICC's Aggregated Net Metering workshop to respond to interconnection questions developers have. If you would like to have another webinar session, please send an email to RenewablesIllinois@ameren.com. However, we have noticed that many of the questions our interconnection team has received to date, especially from companies who have not yet implemented a project in Illinois, are on processes and issues that are addressed on our interconnection website. Please review our website first, as the application process we follow for generators interconnecting at the distribution voltage level is defined by Parts 466 and 467 of the Illinois Administrative Code. General questions about application and interconnection processes are addressed in these materials. As pre-applications and applications are made, we work individually with applicants to address any questions or issues specific to their proposed facility and the location on our distribution system proposed for interconnection.

Q: Ameren Illinois refers to 34.5KV and 69KV lines as part of its "sub transmission" system. If my generator is ultimately interconnected to a 34.5 or 69KV line, is that considered to be interconnected to Ameren Illinois' distribution system for purposes of participating in FEJA programs like aggregated net metering?

A: For Ameren Illinois, all existing lines/systems operating at 69KV and below are considered part of our distribution system, regardless of how they're referred to in our tariffs or in our communications.

Q: Is there any cap on the amount of generation capacity that can be provided to customers relative to their load for net metering purposes?

A: The only limits on net metering generator capacity that Ameren is aware of is the 2MW nameplate criteria and the 40% limitation on the size of a customer's subscription relative to the total capacity of an aggregated net metering generator. Otherwise, Ameren Illinois is indifferent as to the amount of generation a customer chooses to install/chooses to subscribe to.

Q: Will there be a loss factor applied to the allocated generator output depending on the geographic proximity of the generator to its subscribers? That is, will there be a reduction in the kWh of the generator output applied to subscribers' supply usage/charges if the generator is located in the southern part of your territory and its subscribers are in the northern part of your territory?

A: No.

Q: For Non-Residential, DS3 & DS4, customers, if there is excess energy generated it appears that per your Methodology B that any excess value of credits would get used to offset other components of the bill. To the extent that is correct, what is unknown is how this is determined. Is it hourly, daily, weekly, monthly, yearly basis, and what happens to any excess that would result in a negative bill balance?

A: For customers in competitive service classes (for Ameren Illinois, DS-3 and DS-4), the netting occurs on a monthly basis, and there is no carry forward of any excess credits to future Billing Periods. Delivery service charges and taxes for these customers are billed on a gross basis (i.e. there is no netting applied to any demand or usage that's provided from the utility's distribution system.)

If the customer is receiving supply service from Ameren, their supply charges are monetized and the netting of those supply charges is performed on an hourly basis (hourly pricing is the only supply service offered for DS-3 and DS-4 customers from Ameren.) That is, in each hour, the net usage is multiplied by the price for electric supply for that hour, which results in 720 netting calculations in a 30 day month. Those hourly calculations are summed, and any net supply service charges are added to the gross delivery service charges and taxes for that Billing Period.

If the netting results in a supply service credit for the Billing Period, the credit is applied to the gross delivery service charges until the point where the combined supply and delivery service bill reaches \$0.00 (zero.) The customer would then receive a bill for the gross tax. Any remaining supply service credit is donated to the grid.

Customers in competitive service classes who want to receive compensation for all excess generation pushed to the grid typically choose to monetize the output of their generation through Rider QF, since there is no limit on the compensation available under that tariff.