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ComEd TRM Policy Updates

6/23/2025

Solar as EE: PV vs Thermal

Solar PV and Thermal: M&V Alignment

- **Clear End-Use**
  - **Solar Thermal**: M&V boundaries are tightly aligned with specific thermal end uses (e.g., domestic hot water, space heating). Energy savings are measured by the reduction in conventional fuel (electricity or gas) needed to meet these end uses
  - **Solar PV**: M&V boundaries can be clearly defined around on-site electrical loads. PV offsets grid-supplied electricity for lighting, appliances, and HVAC, directly reducing delivery load
- **Self-Consumption Enables Accurate Attribution**
  - Both technologies primarily serve **on-site loads**, allowing for **direct attribution of savings** within the customer's meter boundary. This simplifies M&V and avoids reliance on broader grid modeling or assumptions
- **Comparable to Existing EE Measures**
  - Solar thermal systems are already treated similarly to other EE technologies like heat pumps, which also shift energy sources while reducing total Btus consumed
  - PV systems can be measured like other load-reducing technologies (e.g., voltage optimization), where the focus is on **net reduction in delivered energy**, not just source substitution
- **Avoids Double Counting Through Defined Boundaries**
  - Properly defined M&V boundaries ensure that solar technologies do not double-count savings across EE and renewable portfolios. This supports program integrity and compliance with REC tracking

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