

# Solar Policy Issue: Question 1

**Issue:** *Whether electric utilities can incentivize solar PV (e.g. rooftop solar) through EE programs*

- Does the statutory definition of “energy efficiency” allow a solar as energy efficiency measure (i.e. rooftop solar generation) in the Illinois TRM?

"Energy efficiency" means measures that reduce the amount of electricity or natural gas consumed in order to achieve a given end use. "Energy efficiency" includes voltage optimization measures that optimize the voltage at points on the electric distribution voltage system and thereby reduce electricity consumption by electric customers' end use devices. "Energy efficiency" also includes measures that reduce the total Btus of electricity, natural gas, and other fuels needed to meet the end use or uses.

*Statutory definition of “energy efficiency” excerpted from Illinois Power Agency Act (20 ILCS 3855/1-10) and Public Utilities Act (220 ILCS 5/8-104(b))*

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<i>Does the statutory definition of “energy efficiency” allow a <u>solar as energy efficiency measure (i.e. rooftop solar generation)</u> in the Illinois TRM?</i>			
<u>Comment Submitted By</u>	<u>Yes</u>	<u>No</u>	<u>Link to Comments</u>
ComEd	X		<a href="#">ComEd Presentation (June 9 SAG meeting): Solar as Energy Efficiency</a>
Community Investment Corp. and The Preservation Compact		X	<a href="#">Community Investment Corp. and The Preservation Compact</a>
Franklin Energy	X		<a href="#">Franklin Energy</a>
ICC Staff		X	<a href="#">ICC Staff</a>
Illinois Office of the Attorney General		X	<a href="#">Illinois Office of the Attorney General</a>
Illinois Power Agency (IPA)	IPA did not take an official position on the merits of this proposal - comments explain potential impact of utilities incentivizing solar. IPA urges the SAG to consider (1) whether this proposal is consistent with current statutory language; (2) the potential operational challenges this approach might create for the existing state solar market and interactive effects it may have with the IPA’s solar incentive programs; and (3) the maturity of Illinois’ solar market.		<a href="#">Illinois Power Agency (IPA)</a>
Midwest Energy Efficiency Alliance (MEEA)		X	<a href="#">Midwest Energy Efficiency Alliance (MEEA)</a>
Natural Resources Defense Council (NRDC) and National Consumer Law Center (NCLC)		X	<a href="#">Natural Resources Defense Council (NRDC) and National Consumer Law Center (NCLC)</a>

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**Opportunity for parties who submitted comments to briefly explain their rationale:**

- Midwest Energy Efficiency Alliance (MEEA)
- Natural Resources Defense Council (NRDC) and National Consumer Law Center (NCLC)
- Community Investment Corp. (CIC) and The Preservation Compact
- Franklin Energy

## **ComEd Response**

- Brief explanation of position

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## IL Technical Reference Manual Next Steps:

- IL-TRM Deliverable #2 will be released on Friday, August 1
- Comments on Deliverable #2 are due Friday, August 15

## Next Steps for Solar PV Measures:

- VEIC will not include the proposed solar as PV measures in IL-TRM Deliverable #2. Objection(s) to VEIC not including these measures are due by the Deliverable #2 deadline.
- If any party objects, a non-consensus comparison exhibit will be prepared and circulated for review and feedback.
- If needed, a draft non-consensus comparison exhibit will be circulated by Friday, September 5.