

DER Bulletin 2026-04

Implications of the Clean and Reliable Grid Affordability Act (CRGA) on ESS Rebate Applications and Scheduled Dispatch Virtual Power Plant (SD VPP) Participation

This DER bulletin pertains only to DER interconnections with associated Energy Storage System (ESS) Rebate applications.

This bulletin summarizes new requirements tied to Energy Storage System (ESS) rebates resulting from the implementation of the Clean and Reliable Grid Affordability Act (CRGA) and Ameren Illinois' new Scheduled Dispatch Virtual Power Plant (SD VPP) tariff.

As of June 1, 2026, ESS rebate eligibility is now linked to participation in a utility-managed virtual power plant program. These requirements directly impact how ESS rebate applications are processed and how DER installers should communicate program obligations to Ameren Illinois customers.

To be eligible for an ESS rebate, customers must enroll in an SD VPP program. Ameren Illinois and an authorized third-party provider will coordinate participation, with additional program details to be communicated as implementation progresses.

Scheduled dispatch parameters beginning in 2027 are expected to include:

- Behind The Meter (BTM) systems: Weekdays 4 p.m. to 6 p.m., June–September
- Community Solar Front of The Meter (FTM) systems: Weekdays 4 p.m. to 7 p.m., June–September

An additional ESS performance incentive may be available for eligible systems that satisfy applicable SD VPP participation and performance requirements. DER installers play a critical role in supporting successful adoption of these requirements. Installers should clearly explain that ESS rebate participation includes enrollment in the SD VPP program and may include scheduled, automated dispatch activity consistent with applicable tariff and program requirements. Aligning system design, interconnection compliance, customer expectations, and program obligations upfront will help reduce application delays and customer confusion as the program transitions to a participation-based framework.

Customer Enrollment Reassurance

DER installers can help Ameren Illinois customers understand that enrollment in the SD VPP program does not, by itself, change the customer's existing electric supply option or automatically enroll the customer in, or remove the customer from, other demand response programs.

Customers may continue under their current applicable supply arrangement, including Basic Generation Service (BGS), Real Time Pricing (RTP), Power Smart Pricing (PSP), or other eligible supply options, subject to the terms and conditions of those arrangements.

SD VPP enrollment supports ESS rebate eligibility and scheduled battery dispatch participation. It is not a supplier switch, retail rate change, or replacement for other demand response offerings. Customers may also remain eligible to participate in applicable demand response programs, including Ameren Illinois programs such as Peak Time Rewards (PTR) and Peak Time Savings (PTS), or programs offered through eligible third-party Retail Electric Suppliers (RES) or Aggregators of Retail Customers (ARCs), where applicable and subject to each program's requirements.

Installers can encourage customers to review the requirements of each applicable program because eligibility, compensation, performance obligations, and operating requirements may vary. The key message for customers is that SD VPP enrollment adds a battery dispatch obligation tied to ESS rebate eligibility, while existing supply choices and other demand response opportunities remain governed by their own separate program rules.

Those seeking additional detail may refer to publicly available materials from the Illinois Commerce Commission (ICC). Relevant proceedings include Ameren Illinois' Rider SD VPP tariff filing (June 2026), Docket No. 25-0678 (Virtual Power Plant program development), and Rider CGR proceedings (including Docket Nos. 18-0439, 21-0854). The statutory basis for these changes is Public Act 104-0458 (CRGA).

Additional questions related to this topic can be submitted to **renewablesillinois@ameren.com**.