



To: PCFO Member Governments

From: PCFO Staff

Date: December 5, 2025

RE: Local Government Engagement with Net-Metering Review at the PUCO – Suggested Talking Points

PCFO Recommendation:

Local Governments should review this memo and submit a comment to the PUCO by December 12 to preserve net metering - a critical tool for residential solar, fairness, and affordability.

Context:

Throughout 2025, the [Public Utilities Commission of Ohio \(PUCO\) has been reviewing net-metering rules](#) as part of a state statute that mandates review every 5 years. On November 5th, 2025, [PUCO staff recommended no changes](#) to the rules, which currently *require* electric distribution utilities to provide net-metering service to customers with residential solar systems – meaning that these companies must provide credits on customers' bills when their onsite energy generation flows back into the grid and benefits the entire community. At the last minute for comment, AEP Ohio requested changes that would allow electric distribution utilities to reduce the on-bill credits for homeowners with solar systems – and even to remove the requirement to offer net-metering to customers.

Call to Action: Now, Ohioans can [file reply comments](#) to AEP at the PUCO through Friday, December 12th. **This is a simple step and PCFO is available to walk you through the process.** PCFO has prepared a list of potential talking points for local governments to explain to the PUCO why AEP's proposed changes would harm both municipal operations and the residents that municipalities represent.

Local Government Talking Points:

PCFO suggests using the following talking points in reply to the PUCO. PCFO recommends customizing the highlighted sections of the text in reply comments with local context.

If you have questions about filing reply comment, [please schedule a time to discuss here](#) and/or email nat@poweracleanfuture.org.

Consumer Protections, Affordability and Fair Credits: Residents across Ohio are facing multiple cost-of-living crises – including skyrocketing electric bills. Homeowners who have already installed solar have made the up-front investment to do so because they know they will ultimately realize savings on their utility bills, and taking this incentive away undermines

consumer rights. [Ohio municipalities like ours] have already recommended to our residents that they take advantage of net-metering to reduce their costs, invest in residential sustainability, and reduce strain on the local grid. Our residents can't afford a reversal on this, but AEP's proposed changes would reduce if not eliminate the financial incentives and consumer protections from net-metering.

If your local government is a retail customer and has installed a rooftop solar project on a governmental building or is considering it:

In addition, cities, counties, and municipalities of all sizes are significant electricity customers in their own right. Our community already has [or could] installed solar on municipal buildings, and stands to benefit from net-metering. The savings from net-metering would allow us to make proactive infrastructure investments in our governmental properties without passing costs on to taxpayers.

Grid Resilience and Community-Wide Benefits of Residential Solar:

Across the state, Ohio is facing increased electricity demand – and we know much of this demand comes from the proliferation of data centers. We also know that residential solutions like distributed generation – primarily via rooftop solar – can offset this demand and protect rising strain on the grid. Further, creating a market for residential solar installation creates local jobs that align with our economic development goals.

And, on December 4, 2025, the Commission held a public hearing for AEP Ohio's ongoing rate case. In response to public comments about rising rates, AEP Ohio suggested that a shortage of generation in Ohio is causing price increases. If there is not enough electricity being generated, then AEP Ohio should welcome a policy that encourages expansion of distributed generation across its territory and across the state.

Home Rule & Local Authority

Local governments like ours have already proactively invested in supporting residential solar. Over twenty local governments in Ohio have achieved national recognition [via SolSmart designation](#), meaning that they have improved permitting and inspection processes and planning and zoning policies to streamline solar adoption. The proposed changes by AEP would undermine this existing local progress. *[Cite existing SolSmart progress and/or goals for increased solar adoption as applicable to your community]*

If you have electric aggregation in your community:

Community Choice Aggregation Impacts: Over 600 local governments in Ohio, including ours, have created community choice electric aggregation programs for our residents and small businesses. These programs help deliver electricity savings and provide electric supply powered by renewable sources in accordance with our economic and environmental goals. We have built trust with our residents to deliver on our aggregation program goals. AEP's proposal could remove net metering access for aggregation participants, which would drastically reduce the full potential of our aggregation program.