



April 2, 2010

PSC

Jefferson City, MO 65102

Re: Proposition C, Renewable Energy Credits (REC's)

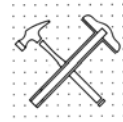
Attn: Michael Tylor

Mr. Tylor and Commission Members

I am an Architect and LEED AP in the St. Louis area that has been working in the sustainable field for thirty years. After much debate and sometimes acrimony the State of Missouri passed Proposition "C". This law is good for Missouri, good for its' citizens and good for the country. I enclose a Benefit Cost analysis I recently completed showing the payback on getting to the approximate 60 mW of generating capacity in solar production the current law requires in ten years. As you can see the return ratio benefit is over six times the costs of the installation given the stated assumptions with an estimated 2.64 Billion cash return into the economy of the state. This program will create long term and clean power production and infuse a huge amount of green infrastructure and job creation within state boundaries.

The citizens of Missouri deserve to know these facts and be given the tools we need to model a clean energy future for our children. It is with this in mind that I request that the PSC revise the language of the following section into one giving the REC's which follow all installations the ability to be truly ground breaking in producing the tipping point we are so all desirous of:

(H) At the time of the rebate payment or anytime thereafter, the electric utility shall offer a one-time lump sum payment, called a Standard Offer Contract, for the current twenty (20) year fixed price for associated S-RECs. Preference shall be given to customers with systems under ten (10) kilowatt capacity. Any customer that receives the rebate and the one-time lump sum S-REC payment shall not be entitled to any other compensation for S-RECs transferred to the electric utility. To facilitate installations of these less than ten (10) kilowatt systems, all procedures, forms and requirements shall be clear, simple, and straightforward to minimize time and effort of residential and small business customers. The sale of any S-RECs created by the installed solar electric system shall not be included as a requirement of the utility's interconnection agreement. For purposes of this subsection, the energy that shall be generated by a solar photovoltaic system with a nameplate capacity of ten (10) kW or less shall be estimated using generally accepted analytical tools, unless such smaller systems are equipped with monitoring technology to track actual production. The selection and use of these analytical tools shall be conducted in consultation with the staff of the commission.



By attaching specific language as to the nature and pricing of the REC's the PCS will provide a level, understandable, and stable field in order to reach the goals Prop C lays out as required by law. Please give us in the industry the tools to make these goals achievable and make a greener and richer state of Missouri for us all to live in.

Respectfully,

James M. Holtzman, NCARB, LEED AP

enclosures