



Date: April 2, 2010  
Revised: April 5, 2010

PSC  
Jefferson City, MO 65102

Re: Proposition C, Renewable Energy Credits (REC's)  
Case No: EX-2010-0169

Attn: Michael Taylor  
Mr. Taylor and Commission Members

This is an update and clarification of my previous correspondence dated; April 2, 2010.

As indicated, I am an Architect and LEED AP in the St. Louis area that has been working in the sustainable field for thirty years. The industry needs the certainty of a stabilized and understandable Solar-REC pricing structure to thrive and our publicly regulated Utilities need the renewable power production these systems will supply to Missourians as mandated by Proposition C.

By setting a price certain that the market could depend on over time a precedent would be established where financing could be reasonably procured for system installations as well as creating an environment where the cost disparities between larger and smaller systems might be somewhat mitigated. A suggested and revised language for paragraph (4)(H) follows:

*"H) The electric utility shall offer a one-(1)-time lump sum payment... for associated S-RECs at the current ten (10)-year fixed price. 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. All procedures, forms and requirements shall be clear, simple, and straight-forward 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. REC's shall be priced starting at a minimum of \$330 per S-REC for the first (2) - years and shall be reduced gradually over the next (8) – thereafter until the capacity required by Proposition C is achieved.*

The enclosed Benefit Cost analysis shows a 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.

We have many interested and ready clients ready to move ahead with installations both large and small. Please give us in the industry the financial tools we need in order to make these goals achievable and make a greener and richer state of Missouri for us all.

Respectfully,

James M. Holtzman, NCARB, LEED AP  
enclosures