

**Missouri RPS – Geographic Eligibility Proposal**  
**Iberdrola Renewables**  
**3-20-09**

Principals

- Underlying energy from eligible resources must be delivered to a Missouri utility via a defined physical delivery path
- RECs may be “unbundled” from underlying energy so long as the underlying energy has been delivered to a Missouri utility.
- Underlying energy delivered to a Missouri utility may only originate in Missouri or from a control area operating part of the transmission system in Missouri

Recommendations

(1) Definitions.

(G) “... Electrical energy purchased by the electric utility is eligible only if it is delivered to a Missouri utility via a defined physical delivery path and is derived from an eligible renewable energy resource located in Missouri or a transmission control area that operates the transmission system in a part of Missouri ~~and only if the utility purchases both the energy and related green attributes.~~”

(2) “...all electric utilities must generate or purchase ~~electricity~~ RECs associated with electricity from eligible renewable energy resources in sufficient quantity to meet the RES requirements on a compliance year basis.”

(3) Renewable Energy Credits. “...~~RECs, S-RECs, or SO-RECs that are not associated with electrical energy, may be used to comply with any portion of the RES requirements, up to and including one hundred (100) percent of the RES requirements. RECs, S-RECs, or SO-RECs acquired by contracts or utilized through a system of tradable RECs, exchanges or brokers may be utilized to comply with the RES requirements. A utility may use a REC, S-REC, or SO-REC separated from the underlying energy to satisfy the RES requirements provided that the underlying energy meets the definition of eligible renewable energy resource(s).~~”