



- Three states have a Fixed Variable Rate Design for electric companies, while ten states (including Missouri), have such a mechanism for gas companies. (The Brattle Group and NAWC, 2013)
  - Forward Test Years
    - Fifteen states allow the use of a Future Test Year for electric and gas companies and seventeen states allow the use of a Hybrid or Transitional Future Test Year for electric and gas companies. While Missouri unfortunately does not allow the use of a Future Test Year for water companies, nineteen other states, including neighbors like Illinois, Arkansas, Kansas, and Nebraska, allow the use of this valuable mechanism. (The Brattle Group and NAWC, 2013)
  - Interim Rates Subject to Refund
  - Targeted Forecasts, Riders or Trackers
    - Transmission fees paid to regional transmission organizations;
    - Property taxes; and
    - Critical infrastructure protection and cyber-security efforts.
  - A Version of Performance-Based Rates
    - Consumer Protections;
    - Affordability, Physical and Cyber-Security, Reliability;
    - PSC Oversight Authority and Retention;
    - Infrastructure Plans;
    - Performance Incentives;
    - Energy Efficiency; and
    - Renewable Resource Development and Distribution.

## **Conclusion**

Once again, MEDA and its members stand ready to engage in a positive discussion around how to improve Missouri's regulatory environment. We believe that we continue to bring constructive and balanced proposals to the table and we look forward to meaningful dialogue with stakeholders to find a solution(s) beginning on September 13<sup>th</sup>.

On behalf of MEDA I would like to thank you again for the opportunity to provide response comments and please don't hesitate to contact me if you have any questions or need further information.

Respectfully submitted,

/s/ Trey Davis

Trey Davis

President

Missouri Energy Development Association

326 East Capitol Avenue

Jefferson City, Missouri 65102

Telephone: (573) 634-8678

Email: [trey@missourienergy.org](mailto:trey@missourienergy.org)

## Works Cited

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