

**BEFORE THE PUBLIC SERVICE COMMISSION OF
THE STATE OF MISSOURI**

In the Matter of Ameren Missouri's Request)
For Approval of a Revised Net Metering Tariff)
and for Variances from Certain Provisions of) File No. ET-2019-____
4 CSR 240-20.065 Regarding Net Metering.)

REQUEST FOR VARIANCES
FROM CERTAIN PROVISIONS OF 4 CSR 240-20.065

COMES NOW, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or "the Company"), and for its *Request for Variances from Certain Provisions 4 CSR 240-20.065 (Request for Variances)*, and states as follows:

1. On August 28, 2018, Section 393.1670 RSMo¹ – which provides that electric utilities shall "make solar rebates available in the amounts specified in this section" - will become effective. Ameren Missouri is submitting revised tariffs intended to implement the requirements of Section 393.1670 RSMo, including the Electric Power Purchases from Qualified Net Metering Units Tariff ("Net Metering Tariff") that is the subject of this variance request.²

2. In File No. EE-2017-0235, the Commission previously approved eight variances to the Company's Net Metering tariff. In each case, the purpose of the requested and approved variance was to provide additional clarifying language to reduce customer confusion, expedite processing, or to better reflect steps required to implement net metering for participating Ameren Missouri customers. Table 1 below describes those previously granted variances.

¹ Section 393.1670 RSMo was signed into law on June 1, 2018, as part of SB 564.

² Concurrent with this Request for Variances, but under a unique tariff tracking file number, Ameren Missouri is also submitting its revised Rider SR – Solar Rebate 2019-2023 – 393.670, as well as Rider SR – Solar Rebate RS MO 393.1030, and its revised Electric Power Purchases From Qualifying Facilities (QF). Neither of those tariff submissions require a variance for appropriate implementation.

Table 1 – Previously Granted Variances		
	Variance Requested	(Prior Variance) Existing Variance
1	Multiple Locations - Substitute the word “Company” in place of “Ameren Missouri”	(File No. ET-2013-0197) File No. EE-2017-0235
2	Sheet No. 171.6 - Use the term “bi-directional meter” in place of “net meter” when the equipment is referenced rather than the billing methodology	File No. EE-2017-0235
3	Sheet No. 171.6 - Replace “Inspection” with “Company’s inspection” as appropriate to avoid confusion between inspections by the Company and local Authority Having Jurisdiction	File No. EE-2017-0235
4	Sheet No. 171.6 - Revise language to reflect limited availability of solar rebates and complexity of the solar rebate queue (see <i>Stipulation and Agreement</i> in File No. ET-2014-0085)	File No. EE-2017-0235
5	Interconnection Application/Agreement, Section B - Add clarity to information required regarding a disconnect switch and reduce the number of required Company-customer communications	(File No. ET-2013-0197) File No. EE-2017-0235
6	Interconnection Application/Agreement, Section D.5. – Revise to: a - “The Customer-Generator shall be responsible for all other bill components charged to similarly situated customers that are not Customer-Generators”	(File No. ET-2013-0197) File No. EE-2017-0235
7	Interconnection Application/Agreement, <i>New</i> Section D.10. - Include a new section D.10. in compliance with the <i>Stipulation and Agreement</i> filed in File No. ET-2016-0179.	File No. EE-2017-0235
8	Interconnection Application/Agreement, Section I - Delete language in the “Solar Rebate Declaration” and, after listing the potential rebate amounts, add a sentence directing customers to the Company’s Rider SR-Solar Rebate at www.ameren.com	File No. EE-2017-0235

3. As a result of the passage of Section 393.1670 RSMo, Ameren Missouri is requesting an additional variance to remove the "solar rebate application" information from the Net Metering Tariff. This information is currently required by Sections H. & I. of the "Interconnection Application/Agreement for Net Metering Systems With Capacity of 100 KW or Less" contained in 4 CSR 240-20-065. Ameren Missouri requests this variance because it will

create a single, online solar rebate application for use by all prospective solar rebate customers irrespective of the method of interconnection that they select (Net Metering or QF). This is both beneficial to customers and administratively necessary for the following reasons:

- A. Customers receiving a solar rebate may interconnect under either the Company's Net Metering tariff or its QF tariff. The previous solar rebate statute - Section 393.1070 RSMo - required interconnection under Net Metering to receive a solar rebate, but Section 393.1670 RSMo does not make such a requirement.
- B. Section 393.1670 RSMo makes solar rebates available for up to 150 KW of capacity, whereas the Net Metering tariff is limited to generation systems not exceeding 100 KW.
- C. Eligibility for Net Metering is also limited by the customer's annual energy consumption. Some customers may "oversize" their system relative to this Net Metering tariff limit and choose to interconnect under the QF tariff.
- D. It would be confusing to customers to have unique solar rebate applications and methods for Net Metering and QF interconnections. The Company anticipates that customers will not know their maximum allowable system size under Net Metering until they begin the application process. It would be unnecessarily burdensome to customers to make them reapply for a solar rebate through a separate process if it is determined that they do not qualify for Net Metering.
- E. It would be administratively inefficient to duplicate the solar rebate applications and process for QF customers.
- F. Customers and developers will be directed, by the Solar Rebate tariff or other communication channels to access the solar rebate application through Ameren.com. Having the solar rebate application continue to be part of the Net Metering tariff could very well mislead customers into inferring that is an appropriate way to apply for a solar rebate. While paper solar rebate applications will be allowed, they will be discouraged and will result in a delay in receiving a "Qualification Date" which establishes their position in the solar rebate queue.

4. Granting this variance and approving the revised Net Metering tariff will not disturb any of the language in the current tariff for which the above-referenced variances were previously granted. Accordingly, Ameren Missouri believes those existing waivers will remain in effect and there is no need to request them again at this time. If the Commission disagrees with this assumption, the Company will amend this Request for Variance accordingly.

WHEREFORE, Ameren Missouri requests the Missouri Public Service Commission approve the Net Metering tariff as filed concurrently with this pleading (and which does not disturb language for which variances have previously been granted), and also approve the new request for a variance of certain portions of 4 CSR 240-020.065, as described above.

Respectfully submitted,

UNION ELECTRIC COMPANY, d/b/a
Ameren Missouri

/s/ Paula N. Johnson

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 27th day of July, 2018, to Staff General Counsel and the Office of the Public Counsel.

/s/ Paula N. Johnson
