

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

In the Matter of Ameren Missouri's                    )     File No. EE-2014-0313  
Solar Rebate Offer.                                    )

**MOSEIA'S COMMENTS IN SUPPORT OF  
AMEREN MISSOURI'S APPLICATION FOR VARIANCE**

Missouri Solar Energy Industries Association ("MOSEIA") hereby files its Comments in Support of the *Application for Variance* filed by Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri") on April 25, 2014. In support of Ameren Missouri's Application, MOSEIA states as follows:

**PARTIES**

1. MOSEIA has its principal place of business at P.O. Box 434040, St. Louis, MO 63143. MOSEIA is a not for profit corporation that represents solar industry stakeholders supporting policy issues focused on solar job creation and sustainable economic growth in Missouri. MOSEIA was formed in large part due to the passage of Proposition C, or the Missouri Renewable Energy Standard ("RES"). Proposition C mandated 15% of the electricity produced by Missouri investor owned utilities comes from renewable sources by 2021, 2% of which must come from solar photovoltaics. MOSEIA and its members have an interest in the full implementation and enforcement of the Missouri RES, as well as the solar rebate program, in that the organization's mission is to strengthen and expand the Missouri solar industry and establish a sustainable energy future for all Missourians. MOSEIA's interest is different than that of the general public.<sup>1</sup>

2. The signature, telephone number, facsimile number and email address of

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<sup>1</sup> MOSEIA filed its Application to Intervene in this case on May 7, 2014. No party has objected to MOSEIA's request to intervene, but its application has not yet been approved by the Commission. Accordingly, MOSEIA files these Comments subject to the Commission's approval of MOSEIA's Application to Intervene.

MOSEIA are those of their legal representatives and can be found in the signature block at the end of this pleading.

3. Union Electric Company, d/b/a Ameren Missouri, 1901 Chouteau Avenue, St. Louis, Missouri, 63166, is an electrical corporation and public utility as defined in Section 386.020, RSMo engaged in the business of manufacture, transmission, and distribution of electricity subject to the regulatory authority of the Commission pursuant to Chapters 386 and 393, RSMo.

#### COMMENTS

4. Ameren Missouri's *Application for Variance* requests the Missouri Public Service Commission ("MPSC" or "Commission") permit an Authority Having Jurisdiction ("AHJ") until July 31, 2014 to complete an inspection of customers' solar generation systems.

5. Ameren Missouri states in their *Application for Variance* that the requested variance is consistent with its current tariff and will ensure that customers will receive a \$2.00 per watt rebate if they have satisfied all conditions necessary, within in the customers' control, for said customers' systems to become operational by June 30, 2014. Following the June 30th deadline, the solar rebate provided by § 393.1030.3, RSMo 2013 will decrease to \$1.50 per watt.

6. Ameren Missouri further states that due to high demand, there is a possibility that AHJs will be unable to complete all required solar system inspections prior to the June 30, 2014 deadline. As a result, Ameren Missouri may be unable to install bi-directional meters necessary for full system operation before June 30, 2014.

7. MOSEIA fully supports Ameren Missouri's variance request. The requested variance is intended to preserve the \$2.00 per watt rebate for customers who, but for the inspection and meter installation backlog anticipated by Ameren Missouri, would have been

eligible for a \$2.00 per watt rebate. Customers who have installed solar generation systems and have satisfied all conditions necessary for system operation should not be penalized for an AHJ's inability to complete a system inspection prior to June 30th. As Ameren Missouri has stated, customers and solar installers have little control over when an AHJ can or will conduct a system inspection. In addition, any inspection delays or backlog experienced by an AHJ are entirely outside of an installer and its customers' knowledge and control.

8. Once a customer has fully satisfied its obligations required to receive a solar rebate, it must wait for an AHJ to conduct a system inspection. Only when a system inspection is complete can Ameren Missouri install a bi-directional meter. A bi-directional meter is required for a customer's system to be deemed "fully operational" and therefore eligible for a rebate.

9. Currently, this two-step process causes a customer anticipating a \$2.00 per watt rebate to be entirely reliant on the AHJ to complete its inspection of the solar generation system before June 30, 2014 in order to receive said \$2.00 per watt rebate. If the AHJ does not complete its inspection in time, the customer would only receive a \$1.50 per watt rebate. Because solar rebates are available for up to 25,000 watts of solar generation, customers may lose as much as \$12,500 in rebates per solar installation as a result of an AHJ's inability to complete an inspection before the June 30th deadline.

10. MOSEIA believes that the requested variance will prevent many customers from being unfairly disqualified from receiving a \$2.00 per watt solar rebate through no fault of their own. Customers who have installed solar generation systems are entirely dependent on the completion of an AHJ system inspection for their solar system to become fully operational. Without the requested variance, otherwise eligible customers may not receive the \$2.00 per watt rebate they are entitled to. By approving Ameren Missouri's Application, the Commission will

prevent significant financial harm to Missouri solar customers as well as the Missouri solar industry.

WHEREFORE, MOSEIA respectfully requests the Commission grant Ameren Missouri's April 25, 2014 Application for Variance.

Respectfully Submitted,

/s/ Wendy Shoemyer

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ATTORNEYS FOR MISSOURI SOLAR  
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been served electronically on all counsel of record this 15th day of May, 2014.

/s/ Wendy Shoemyer

Wendy Shoemyer, # 62080