

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

In the Matter of Renew Missouri)	
Advocates d/b/a Renew Missouri's)	<u>File No. EX-2019-0378</u>
Petition for Amendment of Commission)	
Rule 4 CSR 240-20.060)	

RECOMMENDATION OF MIDWEST COGENERATION ASSOCIATION
IN SUPPORT OF RENEW MISSOURI'S PETITION
June 25, 2019

COMES NOW the Midwest Cogeneration Association ("MCA") in support of the petition of Renew Missouri in this docket asking the Commission to revise and amend its cogeneration rules at 4 CSR 240-20.060.

The MCA was incorporated in 1984 to promote a greater public understanding of clean and efficient cogeneration, also known as combined heat and power (CHP) and waste heat to power (WHP). The organization works to educate policy makers and to breakdown market and regulatory barriers to greater deployment of CHP and WHP in eight Midwest states: Illinois, Indiana, Iowa, Michigan, Minnesota, Missouri, Ohio, and Wisconsin. MCA is active in stakeholder groups and policy forums in the Midwest, appearing before utility commissions, commenting on legislation, publishing reports, and holding seminars, workshops, and conferences on cogeneration.

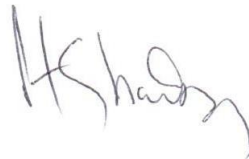
MCA agrees with Renew Missouri that Missouri's current cogeneration rules have failed to fully and effectively implement the goals and requirements of Public Utility Regulatory Policies Act (PURPA) for ensuring a level playing field for small power producers and cogeneration. This failure can be seen in the under representation of cogeneration in Missouri's generation resources compared to its potential and compared to neighboring states. In 2016, the U.S. Department of Energy found that *Missouri has 3,290 MW of cogeneration technical potential capacity identified at 6,384 sites*. But, as of 2019, Missouri has only 236 MW of installed cogeneration capacity at 19 sites. In comparison, Illinois has 1,218 MW of installed cogeneration capacity at 121 sites; Indiana has 2,300 MW of installed capacity at 38 sites; Iowa has 753 MW of installed cogeneration capacity at 33 sites; and Ohio has 434 MW of installed CHP capacity at 61 sites.

Renew Missouri's rulemaking proposal is a step in the right direction for Missouri, allowing the Commission to design and execute a PURPA regime that will increase market access for CHP and WHP and other distributed generation resources. Specifically, MCA supports the Commission opening a rulemaking docket to require equitable utility tariffs and policies for CHP and WHP Independent Power Producers ("IPPs"), including non-discriminatory access to the market under standard interconnection agreements, transparent and equitable avoided cost calculations, and the right to enter into long term contracts. MCA recommends that uniform, stream-lined, transparent, and reliable utility policies and procedures be made available to IPPs, as proposed by Renew Missouri. Getting these policies right will allow Missouri residents and businesses to benefit from the numerous advantages of increased

cogeneration capacity on the grid, including energy efficiency, cost savings, reduced greenhouse gas emissions, and increased reliability.

WHEREFORE, MCA recommends that the Commission commence a rulemaking proceeding to examine the amendments to Missouri's cogeneration rules, at 4 CSR 240-20.060, as proposed by Renew Missouri.

Respectfully,

A handwritten signature in dark ink, appearing to read "P. Sharkey", written in a cursive style.

Patricia Sharkey, Policy Director
Midwest Cogeneration Association