

## Sundermeyer, Susan

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**From:** Taylor, Michael  
**Sent:** Tuesday, June 23, 2009 7:26 AM  
**To:** Sundermeyer, Susan  
**Subject:** FW: Solar Recommendations For June 22 PSC Deadline- Revision 11

Susan:

Please file this e-mail and attachment in EW-2009-0324.

Thanks

Mike

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**From:** Vaughn X. Prost [mailto:vxp@prostbuilders.com]  
**Sent:** Monday, June 22, 2009 5:10 PM  
**To:** Taylor, Michael  
**Cc:** 'PJ Wilson'; 'Henry Rentz'; eric@missourisolarliving.com; 'Carla Klein'; sbrown816@gmail.com; info@missourisolarliving.com; tcreswell@ozarkenergyservices.com; jeff@midamericasolar.com; larry@solutionsbyeclipse.com; bmd@decentenergy.com; Solar1Online@charter.net  
**Subject:** Solar Recommendations For June 22 PSC Deadline- Revision 11

Michael,

The Missouri Solar Installers have submitted their comments though PJ Wilson's efforts, which I agree with but I have some additional comments which I feel will give more definition to how some of the installer comments can be implemented by the PSC.

1. Solar Installer Certification; My recommendation is that initially the Missouri chapter of SEIA which is forming now be the certifying organization until the State of Missouri through a legislative process approves solar installer certification to be performed by a State agency. The professional engineers, architects, hair dressers, etc. all fall under the Division Of Professional Registration which is in the State Department of Insurance, Financial Institutions and Professional Registration ( <http://pr.mo.gov/apelsla.asp>). MOSEIA members want to insure that only professional certified solar installers are working in the industry. Any professional organization wants to control who practices in their industry to protect the public and repute of the profession. There are national tests and certifications that can be phased in so that all qualified installers can be certified over a period of time. MOSEIA members are best suited to make these certification and timing requirements because they know the industry and problems that can come with an unregulated solar industry in Missouri.
2. Workshop to Determine S-RECS- I would propose some financial guidelines to determine S-REC values on an Annual basis. A simple payback period of 5 years for commercial installations and 8 to 10 years for residential installations would determine the S-REC value. If simple paybacks are longer than this companies and Missourian's will generally not invest in solar systems because it is not a prudent investment. As the cost of solar decreases over time the S-REC will be reduced but the simple pay back periods would remain the same because these periods are necessary to get investments to happen.
3. Allocation of S-REC's- Allocation of S-REC's need to be determined by market segments so the S-REC's are distributed over the entire utility retail customer base. MOSEIA can get some utility data with PSC help to determine the percentages for different market segments.

Thanks for reviewing these comments and your work to make workable rules for all!!

Vaughn Prost, P. E.

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