

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

In the Matter of the Application of The)
Empire District Electric Company for)
Certificates of Convenience and Necessity) File No. EA-2019-0010
Related to Wind Generation Facilities.)

**RENEW MISSOURI'S
STATEMENT OF POSITIONS**

COMES NOW Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri"),
and offers its *Statement of Positions*:

Issue 1: Does the evidence establish that the Kings Point, Neosho Ridge, and North Fork Ridge wind projects for which The Empire District Electric Company ("Empire") is seeking certificates of convenience and necessity ("CCN") are "necessary or convenient for the public service" within the meaning of that phrase in section 393.170, RSMo.?

Renew Missouri Position

Yes. The Commission should grant Empire's requested CCNs. With the Commission's approval, this project will be completed in time to maximize the benefits of the federal production tax credits through a tax equity partner and gives customers the best value for a project that can aid Empire in complying with Missouri's renewable energy standards.

In addition to allowing customers to benefit from economic as well as renewable generation, these wind projects create a variety of other benefits, including: payments to landowners, construction jobs, and increased state and local tax revenues. Moreover, a growing number of customers want more access to renewable energy resources to meet their own sustainability metrics. Governmental bodies in Missouri are also beginning to establish their own clean energy goals. With this pressure from large and influential utility customers as well as local governments, the utilities in Missouri - including Empire - must continue to look to renewable

generation to meet customers' need and preferences. The Commission should grant the requested CCNs in this case so Empire can meet those needs with low-cost, economic wind.¹ For these reasons, this project is necessary, convenient, and serves the public interest and so the Commission should issue an order granting the requested relief.

Issue 2: For each CCN the Commission grants, what conditions, if any, should the Commission deem to be reasonable and necessary, and impose?

Renew Missouri Position

Renew Missouri opposes the conditions proposed by the Office of Public Council and the Missouri Department of Conservation as both unnecessary and unreasonable.² Instead, the Commission should impose the reasonable Market Protection Provisions as described in the Surrebuttal Testimony of David Holmes.³

WHEREFORE, Renew Missouri submits its *Statement of Positions*.

Respectfully,

/s/ Tim Opitz

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 22nd day of March 2019:

/s/ Tim Opitz

¹ Owen Surrebuttal, p. 3.

² Owen Surrebuttal, p. 2.

³ Holmes Surrebuttal, pp. 8-13.