

Exhibit No.:
Issue: Policy/Overview
Witness: Tim M. Rush
Type of Exhibit: Direct Testimony
Sponsoring Party: KCP&L Greater Missouri Operations Company
Case No.: EA-2014-
Date Testimony Prepared: September 4, 2013

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO.: EA-2014-

DIRECT TESTIMONY

OF

TIM M. RUSH

ON BEHALF OF

KCP&L GREATER MISSOURI OPERATIONS COMPANY

**Kansas City, Missouri
September 2013**

“ [REDACTED] **” Designates “Highly Confidential” Information
Has Been Removed.**

DIRECT TESTIMONY

OF

TIM RUSH

Case No. EA-2014-

1 **Q: Please state your name and business address.**

2 A: My name is Tim Rush. My business address is 1200 Main Street, Kansas City, Missouri
3 64105.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Kansas City Power & Light Company (“KCP&L”) as Director,
6 Regulatory Affairs.

7 **Q: What are your responsibilities?**

8 A: My general responsibilities include overseeing the preparation of the rate case, class cost
9 of service and rate design of both KCP&L and KCP&L Greater Missouri Operations
10 Company (“GMO” or the “Company”). I am also responsible for overseeing the
11 regulatory reporting and general activities as they relate to the Missouri Public Service
12 Commission (“MPSC” or “Commission”).

13 **Q: Please describe your education, experience and employment history.**

14 A: I received a Master of Business Administration degree from Northwest Missouri State
15 University in Maryville, Missouri. I did my undergraduate study at both the University
16 of Kansas in Lawrence and the University of Missouri in Columbia. I received a
17 Bachelor of Science degree in Business Administration with a concentration in
18 Accounting from the University of Missouri in Columbia.

1 **Q: Please provide your work experience.**

2 A: I was hired by KCP&L in 2001 as the Director, Regulatory Affairs. Prior to my
3 employment with KCP&L, I was employed by St. Joseph Light & Power Company
4 (“Light & Power”) for over 24 years. At Light & Power, I was Manager of Customer
5 Operations from 1996 to 2001, where I had responsibility for the regulatory area, as well
6 as marketing, energy consultant and customer services area. Customer services included
7 the call center and collections areas. Prior to that, I held various positions in the Rates
8 and Market Research Department from 1977 until 1996. I was the manager of that
9 department for fifteen years.

10 **Q: Have you previously testified in a proceeding before the MPSC or before any other**
11 **utility regulatory agency?**

12 A: I have testified on several occasions before the MPSC on a variety of issues affecting
13 regulated public utilities. I have additionally testified at the Federal Energy Regulatory
14 Commission and the Kansas Corporation Commission.

15 **Q: On whose behalf are you testifying?**

16 A: I am testifying on behalf of GMO.

17 **Q: What is the purpose of your Direct Testimony?**

18 A: The purpose of my Direct Testimony is to support:

- 19 1) the application and tariff the Company has filed to suspend payments of the solar
20 rebates for GMO to become effective November 3, 2013 (attached as Schedule
21 TMR-2),
22 2) provide background of the solar rebate program,

1 3) supporting the current payments made for the solar rebates (attached as Schedule
2 TMR-1), and

3 4) address what actions the Company has taken in making this filing.

4 **BACKGROUND**

5 **Q: Please provide some background on this case and what has lead up to this filing.**

6 **A: Proposition C** - On November 4, 2008, Proposition C was adopted by the voters of
7 Missouri and later codified as Section 393.1030 RSMo (Cum.Supp. 2009) which
8 mandated, *inter alia*, that the “commission shall, in consultation with the department,
9 prescribe by rule a portfolio requirement for all electric utilities to generate or purchase
10 electricity generated from renewable energy resources. . .” Section 393.1030.1. RSMo.
11 (Cum. Supp. 2009). Proposition C also stated that “Such rules shall include: (1) A
12 maximum average retail rate increase of one percent determined by estimating and
13 comparing the electric utility’s cost of compliance with least-cost renewable generation
14 and the cost of continuing to generate or purchase electricity from entirely nonrenewable
15 sources, taking into proper account future environmental regulatory risk including the
16 risk of greenhouse gas regulation. . .” Section 393.1030.2(1).

17 **4 CSR 240.20.100** - In compliance with Section 393.1030, the Commission adopted 4
18 CSR 240-20.100 Electric Utility Renewable Energy Standard Requirements (effective
19 September 30, 2010) which states, *inter alia*, that: “The retail rate impact . . . may not
20 exceed one percent (1%) for prudent costs of renewable energy resources directly
21 attributable to RES compliance.” 4 CSR 240-20.100(5). In addition, Subsection D of 4
22 CSR 240-20.100(5) states as follows:

23 For purposes of the determination in accordance with subsection
24 (B) of this section, if the revenue requirement including the RES-

1 compliant resource mix, averaged over the succeeding ten (10)-year
2 period, exceeds the revenue requirement that includes the non-renewable
3 resource mix by more than one percent (1%), the utility shall adjust
4 downward the proportion of renewable resources so that the average
5 annual revenue requirement differential does not exceed one percent (1%)
6 . . . (emphasis added)

7 **GMO Solar Rebate Tariff** - The Company has on file with the Commission, tariffs
8 which prescribe the Solar Photovoltaic Rebate Program (P.S.C. MO. No. 1, 2nd Revised
9 Sheet No. R-62.19 and P.S.C. MO. No. 1, 1st Revised Sheet No. R-62.20). On page R-
10 62.20, section D, the second paragraph describes the method by which applications and
11 funding of the rebate is handled.

12 Rebates will be paid on a first-come, first served basis, as
13 determined by the Solar Electric Systems operational date. Any rebate
14 applications that are received in a particular calendar year but not
15 approved due to Program funding limitations will be the first applications
16 considered in the following calendar year. Applications accepted by the
17 Company will expire 12 months after receipt if the Customer has not
18 satisfied the terms of this tariff or if the Solar Electric System has not
19 become operational. All Application forms may be obtained from the
20 Company's website www.KCPL.com.

21 **RES Plan filing** - On May 28, 2013, GMO filed its 2013 Annual Renewable Energy
22 Standard Compliance Plan (2013 GMO Plan¹) in File No. EE-2013-0453², pursuant to 4
23 CSR 240-20.100. In the 2013 GMO Plan, the retail rate impact was calculated by
24 comparing a non-renewable generation and purchased power portfolio to a RES-
25 compliant portfolio with sufficient renewable resources to achieve the renewable
26 standards. This analysis showed that the retail rate impact would exceed the one percent
27 (1%) cap for the years 2013, 2014 and 2015, unless solar rebates were limited to maintain

¹ The 2013 GMO Plan is incorporated herein by reference.

² On May 29, 2013, the Commission issued its *Order Closing Case, Order Directing Notice And Order Setting Filing Deadline* in File Nos. EE-2013-0453 and EO-2013-0505 directing that notice and establishing a deadline for Staff to file a report and for other interested entities to file comments by July 12, 2013. The 2013 GMO Plan was also filed in File No. EO-2013-0505.

1 the 1% cap. Since GMO is projected to exceed the 1% retail rate impact in 2013, 2014,
2 and 2015 due to solar rebates, solar rebate payment assumptions were limited to maintain
3 the 1% cap. (See also 2013 GMO Plan, p. 13). GMO believes that by its calculation, the
4 Company exceeded the 1% cap in July 2013³, and as a result, not all solar rebates will be
5 honored this year in order to reduce the revenue requirement associated with the RES
6 program in 2013. Any solar rebates not honored in a given year would be the first rebates
7 considered for payment in the following year.

8 SOLAR REBATE PROGRAM PAYMENTS

9 **Q: What is the current forecast for solar rebates at GMO?**

10 A: GMO's current forecast is \$40 million in solar rebate payments by the end of 2013. I
11 have attached the latest forecast to my testimony as Schedule TMR-1. This forecast may
12 change based on many factors, but the Company believes that the actual solar rebate
13 payments will more than likely increase, rather than decrease when compared to the
14 forecast. As of July, 2013, GMO has paid out over \$11 million in solar rebates. GMO's
15 1% rate cap filed in its Company's RES Plan is slightly over \$10 million. This is more
16 fully described in the testimony of Company witness Burton Crawford.

17 **Q: Parties have raised concerns about solar installer U.S. Solar. What actions has the**
18 **Company taken to address these concerns?**

19 A: The Company has taken these concerns very seriously. KCP&L has audited several of
20 U.S. Solar's installations. In addition, the Company is in the process of auditing the top
21 ten solar installation vendors in both GMO and KCP&L service territories.

³ Kansas City Power & Light Company ("KCP&L") is expected to exceed the 1% cap in November, 2013, as determined by the same methodology utilized in Attachment No. 1.

1 ** [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]** The audit of the remaining ten solar

8 installers is ongoing.

9 Q: ** [REDACTED]

10 [REDACTED]

11 [REDACTED]**

12 A: ** [REDACTED]

13 [REDACTED]**

14 Q: **Should this impact the overall 1% cap?**

15 A: No. ** [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]** In any event, the Company acted in good faith and in accordance with its

19 tariffs, when it provided solar rebates on the plans and certifications provided by

20 customers and installers. ** [REDACTED]

21 [REDACTED]

22 [REDACTED]**

1 **Q: Is the Company requesting recovery of the amount paid to solar vendors and all**
2 **other RES compliance costs in this case?**

3 A: No. This case is only dealing with the determination of whether the Company should
4 cease paying solar rebates in 2013 and the determination of the 1% cap as it is defined in
5 the Rules.

6 **1% CAP CALCULATION**

7 **Q: What is meant by the 1% cap?**

8 A: Section 5 of 4 CSR 240-20.100 sets out the retail rate impact of the RES rule and
9 describes the retail rate impact calculation:

10 **4 CSR 240-20.100 (5) Retail Rate Impact.**

11 (A) The retail rate impact, as calculated in subsection (5)(B), may not
12 exceed one percent (1%) for prudent costs of renewable energy resources
13 directly attributable to RES compliance. The retail rate impact shall be
14 calculated on an incremental basis for each planning year that includes the
15 addition of renewable generation directly attributable to RES compliance
16 through procurement or development of renewable energy resources,
17 averaged over the succeeding ten (10)-year period, and shall exclude
18 renewable energy resources owned or under contract prior to the effective
19 date of this rule.

20 (B) The RES retail rate impact shall be determined by subtracting the total
21 retail revenue requirement incorporating an incremental non-renewable
22 generation and purchased power portfolio from the total retail revenue
23 requirement including an incremental RES compliant generation and
24 purchased power portfolio. The non-renewable generation and purchased
25 power portfolio shall be determined by adding to the utility's existing
26 generation and purchased power resource portfolio additional non-
27 renewable resources sufficient to meet the utility's needs on a least-cost
28 basis for the next ten (10) years. The RES-compliant portfolio shall be
29 determined by adding to the utility's existing generation and purchased
30 power resource portfolio an amount of renewable resources sufficient to
31 achieve the standard set forth in section (2) of this rule and an amount of
32 least-cost non-renewable resources, the combination of which is sufficient
33 to meet the utility's needs for the next ten (10) years.

1 These renewable energy resource additions will utilize the most recent
2 electric utility resource planning analysis. These comparisons will be
3 conducted utilizing projections of the incremental revenue requirement for
4 new renewable energy resources, less the avoided cost of fuel not
5 purchased for nonrenewable energy resources due to the addition of
6 renewable energy resources. In addition, the projected impact on revenue
7 requirements by non-renewable energy resources shall be increased by the
8 expected value of greenhouse gas emissions compliance costs, assuming
9 that such costs are made at the expected value of the cost per ton of
10 greenhouse gas emissions allowances, cost per ton of a greenhouse gas
11 emissions tax (e.g., a carbon tax), or the cost per ton of greenhouse gas
12 emissions reductions for any greenhouse gas emission reduction
13 technology that is applicable to the utility's generation portfolio,
14 whichever is lower. Calculations of the expected value of costs associated
15 with greenhouse gas emissions shall be derived by applying the
16 probability of the occurrence of future greenhouse gas regulations to
17 expected level(s) of costs per ton associated with those regulations over
18 the next ten (10) years. Any variables utilized in the modeling shall be
19 consistent with values established in prior rate proceedings, electric utility
20 resource planning filings, or RES compliance plans, unless specific
21 justification is provided for deviations. The comparison of the rate impact
22 of renewable and non-renewable energy resources shall be conducted only
23 when the electric utility proposes to add incremental renewable energy
24 resource generation directly attributable to RES compliance through the
25 procurement or development of renewable energy resources.

26 (C) Rebates made during any calendar year in accordance with section (4)
27 of this rule shall be included in the cost of generation from renewable
28 energy resources.

29 (D) For purposes of the determination in accordance with subsection (B)
30 of this section, if the revenue requirement including the RES-compliant
31 resource mix, averaged over the succeeding ten (10)-year period, exceeds
32 the revenue requirement that includes the non-renewable resource mix by
33 more than one percent (1%), the utility shall adjust downward the
34 proportion of renewable resources so that the average annual revenue
35 requirement differential does not exceed one percent (1%). In making this
36 adjustment, the solar requirement shall be in accordance with subsection
37 (2)(F) of this rule. Prudently incurred costs to comply with the RES
38 standard, and passing this rate impact test, may be recovered in
39 accordance with section (6) of this rule or through a rate proceeding
40 outside or in a general rate case.

41 (E) Costs or benefits attributed to compliance with a federal renewable
42 energy standard or portfolio requirement shall be considered as part of
43 compliance with the Missouri RES if they would otherwise qualify under
44 the Missouri RES.

1 **Q: Are there alternative views in how the 1% cap is to be calculated?**

2 A: Yes. Company witness Burton Crawford describes in his Direct Testimony the
3 calculation performed by the GMO and addresses some of the differences between the
4 Staff's positions that was previously expressed in File No. ET-2014-0026. GMO
5 requests that the Commission resolve these differences in this case and issue its order
6 within sixty (60) days of this filing as required by statute.

7 **Q: When the Company became aware that it expected to reach the 1% retail rate**
8 **impact, what did it do?**

9 A: The Company set up a meeting with solar installers to inform them that the Company
10 believed that based on current information, that it would reach the cap in July. A
11 meeting was held at the Company's offices in Kansas City on June 20 and nearly all
12 installers were present. At that meeting, installers were informed that GMO anticipated
13 reaching the 1% cap in July and that GMO intended to make a filing with the Missouri
14 Public Service Commission to suspend the payment of rebates. Rather than shutting
15 down the rebate program the moment the Company reached the cap, GMO told the
16 installers that the Company would follow the spirit of the recently passed House Bill 142
17 ("HB 142") and make the tariff filing with an effective date of 60 days, rather than the
18 traditional 30 day effective date. The Company indicated that it would continue paying
19 rebates during that 60 day period. This was to provide the installers time to address
20 current projects and give them ample time to plan for the suspension.

TARIFF FILING

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Q: What authority did the Company have to suspend the rebates once it reached the 1% cap?

A: The Company’s Rules and Regulations, Sheet Nos. R-62.19 and R-62.20, Rule 9.18 Solar Photovoltaic Rebate Program, sections B and D outlines the Purpose and the Program Rebates provides the authority to suspend rebate payments.

The last sentence in Section B Purpose states: “Funds for the Program will be limited by the Company based on the limits of §393.1030, RSMo, 4 CSR 240-20.100 , or the Company’s Net Metering Rider. Further, in the last paragraph under section D. on page R-62.20, it states:

Rebates will be paid on a first-come, first-served basis, as determined by the Solar Electric Systems operational date. Any rebate applications that are received in a particular calendar year but not approved due to Program funding limitations will be the first applications considered in the following calendar year. Applications accepted by the company will expire 12 months after receipt if the Customer has not satisfied the terms of this tariff or if the Solar Electric Systems has not become operational. All Applications forms may be obtained from the Company’s website www.KCPL.com.

Q: When was the Company’s initial tariff filed to suspend payments under the solar rebate program?

A: On July 5, 2013, GMO filed a motion to approve a tariff sheet and a motion for expedited treatment in File No. EO-2013-0505. The tariff had a 60 day effective date and the Company requested expedited treatment The Commission ordered parties to file responses to the tariff sheet and motion no later than July 30, 2013.

Q: What followed the filing?

A: On July 12, 2013, Brightergy and MOSEIA filed pleadings opposing GMO’s motion to approve its tariff sheet. On July 30, 2013, Renew Missouri also filed its pleading in

1 opposition to GMO's motion to approve the tariff sheet. On July 31, 2013, Staff filed its
2 *Staff Recommendation To Reject Tariff Sheet*. Staff's recommendation contained three
3 concerns about the calculation of the RRI 1% cap.

4 On August 1, 2013, the Commission issued its *Order Opening Case To Consider Tariff*
5 in File Nos. EO-2013-0505 and ET-2014-0026 which directed that all pleadings and
6 motions concerning the solar rebate tariff should be filed in File No. ET-2014-0026, and
7 not in File No. EO-2013-0505. (*Order*, p. 1) On August 8, 2013, the Commission issued
8 its *Order Suspending Tariff and Setting Prehearing Conference* in which the Commission
9 scheduled a prehearing conference and suspended the tariffs until October 3, 2013.

10 A prehearing conference was convened on Wednesday, August 21, 2013. At the
11 prehearing, Regulatory Law Judge Ron Pridgin directed the parties to propose a
12 procedural schedule by Wednesday, August 28, 2013. The parties diligently worked on a
13 procedural schedule that would allow for determination by the Commission and
14 implementation of the Order within 60 days.

15 **Q: Why did the Company decide to withdraw its filing in File No. ET-2014-0026 and**
16 **make this filing?**

17 A: The Company was hopeful that it would reach a resolution by its initial filing date of
18 September 3rd in File No. ET-2014-0026. In working with the parties develop a joint
19 procedural schedule, it became apparent that more time was needed beyond October 3rd
20 to process the case. Additionally, HB 142 became law on August 28th. As a result, the
21 Company determined that it would be appropriate to file under the provisions of HB 142.

1 Under the provisions of HB 142, the Commission is directed to decide the case within
2 sixty (60) days of filing.⁴

3 **Q: Has the Company filed a tariff supporting this application?**

4 A: Yes. Simultaneous with this filing, the Company has filed a tariff to suspend the solar
5 rebates with an effective date of November 3, 2013. Attached to my testimony as
6 Schedule TMR-2 is the tariff that was filed today.

7 **Q: Are there important policy considerations that the Company took into account in
8 deciding not to immediately suspend solar rebate payments to the customers?**

9 A: An immediate suspension of the solar rebate tariff could have an impact on customers
10 who have contracted with the solar installers. Additionally, it could have an impact to the
11 solar installers who have established a business. It is the Company's intent to follow an
12 orderly process of notification to the customer and solar installers and a filing with the
13 Commission to gain approval of a tariff to suspend payment.

14 From a policy perspective, it is important to note that the Company is not trying to hurt
15 the solar industry by this filing. Instead, the Company remains committed to alternative
16 fuels and renewable resources. However, the Company is taking these steps to follow the
17 mandates of the RES law and protect our customers who do not receive solar rebate
18 payments from paying a subsidy related to the solar market.

⁴ HB 142 states in part:

If the electric utility determines the maximum average retail rate increase provided for in subdivision (1) of subsection 2 of this section will be reached in any calendar year, the electric utility shall be entitled to cease paying rebates to the extent necessary to avoid exceeding the maximum average retail rate increase if the electrical corporation files with the commission to suspend its rebate tariff for the remainder of that calendar year at least sixty days prior to the change taking effect. The filing with the commission to suspend the electrical corporation's rebate tariff shall include the calculation reflecting that the maximum average retail rate increase will be reached and supporting documentation reflecting that the maximum average retail rate increase will be reached. The commission shall rule on the suspension filing within sixty days of the date it is filed. . .

1 Q: Does that conclude your testimony?

2 A: Yes, it does.

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

In the matter of KCP&L Greater Missouri)
Operations Company's Application) File No.
For Authorization To Suspend Payment)
of Certain Solar Rebates)

AFFIDAVIT OF TIM M. RUSH

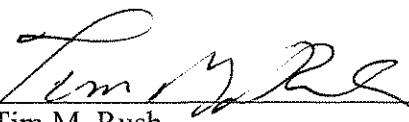
STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Tim M. Rush, being first duly sworn on his oath, states:

1. My name is Tim M. Rush. I work in Kansas City, Missouri, and I am employed by Kansas City Power & Light Company as Director, Regulatory Affairs.

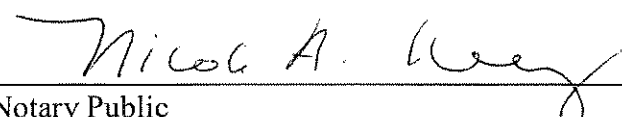
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of KCP&L Greater Missouri Operations Company consisting of thirteen (13) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.

3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.



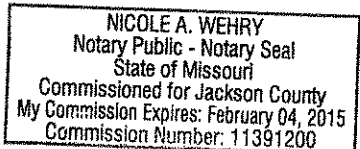
Tim M. Rush

Subscribed and sworn before me this 21st day of September, 2013.



Notary Public

My commission expires: Feb. 4, 2015



KCP&L Greater Missouri Operations Company

2013 Solar Rebate Forecast

	Monthly Rebates Paid \$	Cumulative Rebates YTD \$
January	502,000	502,000
February	2,096,110	2,598,110
March	758,700	3,356,810
April	1,886,820	5,243,630
May	1,740,440	6,984,070
June	1,687,270	8,671,340
July	2,697,630	11,368,970
<i>August</i>	<i>6,184,429</i>	<i>17,553,399</i>
<i>September</i>	<i>5,944,959</i>	<i>23,498,358</i>
<i>October</i>	<i>5,606,487</i>	<i>29,104,845</i>
<i>November</i>	<i>5,486,023</i>	<i>34,590,868</i>
<i>December</i>	<u><i>5,447,304</i></u>	<i>40,038,172</i>
<i>Total</i>	<i>40,038,171</i>	

NOTE: Values in *Italic* are forecasted values.

STATE OF MISSOURI, PUBLIC SERVICE COMMISSION

P.S.C. MO. No. 1 ~~3rd~~ Revised Sheet No. R-62.19
Canceling P.S.C. MO. No. 1 ~~2nd~~ Revised Sheet No. R-62.19

KCP&L Greater Missouri Operations Company For Territory Served as L&P and MPS
KANSAS CITY, MO

RULES AND REGULATIONS
ELECTRIC

9.18 Solar Photovoltaic Rebate Program

A. PURPOSE:

The Solar Photovoltaic Rebate Program (SPRP or Program) provides rebates to Missouri electric utility retail customers, pursuant to §393.1030, RSMo, who install new or expanded Solar Electric Systems that become operational after December 31, 2009.

B. PURPOSE:

The Program is available to any Customer that qualifies as a Customer-Generator under the Company's Net Metering Rider Electric tariff, is currently receiving service under any generally available retail rate schedule, with an account that is not delinquent or in default at the time of rebate processing, and has completed the required rebate application. Funds for the Program will be limited by the Company based on the limits of §393.1030, RSMo, 4CSR 240-20.100, or the Company's Net Metering Rider.

The Program is currently suspended as funding limits established by §393.1030, RSMo and 4 CSR 240-20.100 have been reached. The Company will continue to accept applications for Net Metering under the Net Metering Rider, but rebates for Solar Electric Systems will not be available until a subsequent calendar year. Rebates will be paid in order, based on the operational date of the Solar Electric System.

C. DEFINITIONS:

Solar Electric System – a permanently installed, new or expanded system, interconnected and operated in parallel phase and synchronization with an electric utility that has been approved for interconnection by said electric utility, which uses solar modules to convert light into electricity. As installed, the Solar Electric System shall be situated in a location where a minimum of eighty-five percent (85%) of the solar resource is available to the system as verified by the Customer or the Customer's installer at the time of installation. Systems are declared by the Customer to remain in place on the Customer's premises for the duration of its useful life which shall be deemed to be ten (10) years unless determined otherwise by the Commission. The system must consist of equipment that is commercially available and factory new when installed on the Customer's premises and the principal system components (i.e. photovoltaic modules and inverters and excluding battery components) shall be covered by a functional warranty from the manufacturer for a minimum period of ten (10) years.

D. PROGRAM REBATE:

Customers with installed and interconnected Solar Electric Systems may be eligible to receive a rebate of two (\$2) dollars per installed watt up to a maximum of twenty-five (25) kilowatts (kW) per retail account (\$50,000). For the purpose of determining the amount of rebate, the Solar Electric System wattage rating will be the direct current wattage rating provided by the original manufacturer. Customers will be required to complete a rebate application. Applications will be accepted for pre-approval starting January 1, 2010. Customers will be notified in writing, by letter or email, that the rebate application has been accepted or that the rebate application has not been accepted.

Issued: September 4, 2013
Issued by: Darrin R. Ives, Senior Director

Effective: November 3, 2013

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