

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

In the Matter of Ameren Missouri's	)	
Application for Authorization to Suspend	)	<u>File No. ET-2014-0085</u>
Payment of Certain Solar Rebates.	)	Tariff No. YE-2014-0173

**RENEW MISSOURI'S STATEMENT OF POSITIONS**

COMES NOW Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), pursuant to the Commission's *Order Adopting Procedural Schedule* issued on October 18, 2013, and below states its position on the issues in this case.

1. For the issues on which Renew Missouri states no position, Renew Missouri reserves the right to fully participate in these proceedings as to all relevant issues.

2. Renew Missouri understands that this filing is past due and apologizes for the inconvenience, but offers its statement of positions in the interest of assisting the Commission's record for decision in this case.

**Positions on Issues**

1. Is accurate and reliable information available to perform the 1% retail rate impact calculation under any of the methods proposed in this case? If not, should the Commission deny Ameren Missouri's application in this case?

*For the reasons articulated by the Office of Public Counsel in its Statement of Positions in this case, there is insufficient accurate and reliable information available for Ameren Missouri to perform its 1% retail rate impact calculation in this case. The Commission should deny Ameren Missouri's application in this case.*

2. What is the proper method of calculating the 1% retail rate impact cap under Rule 4 CSR 240-20.100 (5)(B)?

*This issue, which has been the subject of considerable disagreement, is ultimately best left to be decided in the Commission's rulemaking case for HB 142. In the interim, the 1% retail rate impact limit should be calculated using the most common sense interpretations of the language of Rule 4 CSR 240-20.100(5)(B).*

3. In utilizing the method of calculating the 1% retail rate cap that the Commission determines is appropriate:

a. What generation resources are included in the non-renewable portfolio when completing the retail rate impact calculation under Rule 4 CSR 240-20.100 (5)(B)?

*The generation resources to be included in the non-renewable portfolio include all non-renewable generation currently owned or purchased by the utility, plus a hypothetical amount of owned generation or purchased power sufficient to replace the utility's current owned or purchased renewable generation. Accordingly, any pre-existing renewable resources or costs associated with resources such as Ameren Missouri's Keokuk Hydroelectric facility or Pioneer Prairie Wind Farm PPA should not be included in the non-renewable portfolio for purposes of calculating the 1% retail rate impact.*

b. Is there any basis in the statutes, regulations or Commission's Orders for excluding some or all of the costs of any existing or anticipated renewable energy resources from the ten year RES-compliant portfolio revenue requirement calculation used to determine the cap? If so, which costs?

*Rule 4 CSR 240-20.100(5)(A) provides that renewable resources owned or under contract prior to the effective date of the rule should not be included in the 1% retail rate impact calculation. Ameren Missouri included in its 1% retail rate impact calculation certain costs attributable to its Pioneer Prairie PPA; however, it is clear that the Pioneer Prairie PPA was owned or under contract prior to the effective date of the rule and should be excluded. In*

*addition, other costs associated with pre-existing renewable resources such as Ameren Missouri's Keokuk Hydroelectric facility should be excluded.*

*Furthermore, both the RES law and rule imply that the renewable resource costs to be included should reflect net costs, taking into account all measurable benefits to the Company's generation portfolio and transmission grid. Renew Missouri supports inclusion of net RES costs that reflect savings in fuel costs, reductions in peak demand, and other benefits associated with distributed generation and renewables coming on-line.*

c. Should the Commission make a determination in this case of whether Ameren Missouri's prudently-incurred expenditures on solar rebate payments be expensed or amortized? If yes, what determination should the Commission make?

*Yes. The Commission should determine that Ameren Missouri's prudently-incurred expenditures on solar rebates should be amortized over a period of at least ten years.*

f. Should payment of solar rebates be "front-loaded" as suggested by MOSEIA?

*Yes. Utilizing a front-loading methodology, with substantial agreement from all stakeholder, will allow the Company to continue paying solar rebates for the remainder of 2013 while not impacting customers' rates more than they would be under a 1% annual 10-year average retail rate impact.*

6. Are the sums of solar rebate payments Ameren Missouri has made and those it projects to pay by the end of 2013, greater than the one percent (1%) retail rate impact amount determined in 5 above?

*No. To the extent that the non-inclusion of Pioneer Prairie costs in the retail rate impact calculation will keep Ameren Missouri from reaching its 1% limit (as suggested in Staff's testimony in this case), it is at the very least unclear whether Ameren Missouri's solar rebate payments will exceed their 1% limit by the end of 2013.*

7. Should the Commission authorize Ameren Missouri to stop making solar rebate payments beginning no earlier than December 10, 2013, in order to comply with Section 393.1030.2 (1) and .3 RSMo (Supp. 2013) and Rule 4 CSR 240-20.100 (5)?

*No. The Commission should deny Ameren Missouri's request to stop making solar rebate payments on December 10<sup>th</sup>, 2013. If the Commission does authorize Ameren Missouri to suspend payment of solar rebates for the remainder of 2013, the Commission should clarify in its order that the Company should continue accepting solar rebate applications through December 31<sup>st</sup>, 2013, allowing such applying customers to take advantage of solar rebates at the \$2/watt level as detailed in the HB 142 legislation.*

Respectfully submitted,

EARTH ISLAND INSTITUTE  
d/b/a RENEW MISSOURI

/s/ Andrew J. Linhares

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## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 7<sup>th</sup> day of November, 2013.

*/s/ Andrew J. Linhares* \_\_\_\_\_

Andrew J. Linhares