

Mike,
Missouri Renewable Energy Workshop Comments submitted by The Energy Savings Store. Draft Revision 11, 4 CSR 240-20.XXX Electric Utility Renewable Energy Standard Requirements

The Energy Savings Store has signed onto the letter submitted by PJ Wilson on behalf of Missouri Solar Installers. We would also like to respectfully submit these additional comments for consideration.

We support the revision below submitted by Renew Missouri and request these additional changes to Section (H).

Streamlining the process of S-REC payments section Section 4(H):

Incentive programs for smaller solar systems are intended to defray the large up-front cost of installing solar. To simplify the procedure of S-REC contracts, we recommend modifying the first sentence of

FROM:

At the time of the rebate payment or anytime thereafter, the electric utility may negotiate a one time lump sum payment or annual payments for any S-RECs...

TO:

*At the time of rebate application approval, the electric utility ~~may negotiate~~ **shall offer a one time lump sum payment or annual payments, called a Standard Offer Contract, for the current 20-year fixed price for associated S-RECs.***

Further amend Section 4 (H) by inserting: “Preference shall be given to customers with systems under 10kW in size. Any customer that receives the rebate and the one-time lump sum SREC payment shall not be entitled to any other compensation for SRECs transferred to the utility. To facilitate installation of these small systems, all procedures, forms, and requirements shall be clear, simple and straightforward to minimize time and effort of homeowners and small businesses.”

Supporting smaller diverse generation capacity can off set peak energy demand particularly in the summer when solar can play a vital role in demand reduction. Reducing peak demand will reduce overall energy costs for all rate payers.

Additionally to promote a significant level of development across all market segments providing a system for setting S-REC values to assure a diversified system of renewable energy for the state of Missouri could be supported by establishing parameters for those values. The Energy Savings Store agrees with and supports the revision below submitted by Renew Missouri with these additional changes.

I. Standard Offer Contract for S-RECs

We believe there should be a process for setting the value of S-RECs, and that this S-REC value should be separated into three tiers:

- Systems up to 25kW in size
- Systems between 25kW and 100kW in size
- Systems larger than 100kW in size

In order to accomplish this, we recommend changing Section 4(J)

FROM:

~~*Electric utilities that have purchased S-RECs under a one-time lump sum payment shall utilize the associated S-RECs in equal annual amounts over the lifetime of the purchase agreement.*~~

And inserting:

For systems up to 25kW in size, and separately for systems between 25kW and 100kW in size, the value of associated S-RECs shall be determined annually by a collaborative workshop hosted by the Missouri PSC, to be held no later than 60 days before January 1st of the coming calendar year, and the S-REC values shall be announced no later than 30 days before January 1st of the coming calendar year. Workshop participants shall include representatives of Missouri investor-owned utilities, solar installers, PSC staff, and public council.

Further amend Section 4 (J) by inserting: “To establish a balanced and fair distribution of SREC values to each size categories, the distribution rates per category shall also be determined on an annual basis.”

For systems above 100kW in size, the S-REC value shall be determined by RFP process on an at least an annual basis. S-REC values shall best appropriate market values and not be less than SREC value established through SRECs procured outside this program.

Thank you for the opportunity to comment. The Energy Savings Store also respectfully requests an additional stakeholder meeting.