

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Consideration of Adoption	)	
Of the PURPA Section 111(d)(11) Net Metering	)	Case No. EO-2006-0493
Standard as Required by Section 1251 of the	)	
Energy Policy Act of 2005	)	

**POSITION STATEMENT OF P. J. WILSON ON BEHALF OF**  
**CONCERNED CITIZENS OF PLATTE COUNTY, SIERRA CLUB, BURROUGHS**  
**AUDUBON, OZARK ENERGY SERVICES, MID-MISSOURI PEACEWORKS AND**  
**HEARTLAND RENEWABLE ENERGY SOCIETY**

In response to the Commission’s March 15 “Order Establishing a Procedural Schedule for On-the-Record Presentations,” I state my position on “prior state action” under EAct 2005 as follows:

Missouri has a law for “net energy metering,” § 386.887, RSMo (2002); however, this should be called a “dual metering” law because it requires separate measurement of electricity flows to and from a customer-generator, with the customer being charged the retail rate for electricity consumed but being credited only at the utility’s avoided cost for electricity fed back onto the grid.

True net metering uses a single bi-directional meter to measure the net flow of electricity, with the customer-generator being billed or credited on a one-to-one basis. Net metering is universally understood to give the customer-generator a full and complete offset of utility-supplied electricity by customer generation, subject only to an annual or monthly true-up for any excess of customer generation over utility-supplied power.

This is how I understand the federal net metering standard and the term “offset” as used in the standard. Missouri’s law is not the same as the PURPA standard, nor is it even “comparable.”

There are ways in which a state standard could be comparable to the PURPA standard. For example, it could use a different definition of an “eligible on-site generating system” in terms of the renewable resources included. It could set a cap on the size of a customer-generator’s facility such as the 100 kW cap in § 386.887.2(5)(c); the federal standard has no cap. Net metering standards can also differ in the way they compensate (or do not) for excess customer generation at a true-up period that could be monthly or annual.

But the essence of net metering is the use of a single meter with one-to-one treatment of net generation. Dual metering is not net metering and cannot even be considered comparable; it is an apples-to-oranges comparison. A state net metering standard cannot be the same as, or comparable to, the PURPA standard unless it is net metering.

/s/ P. J. Wilson

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 11th day of April, 2007, to the persons on the EFIS service list.

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