



## MISSOURI SOLAR APPLICATIONS, LLC

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Public Service Commission  
PO Box 360  
Jefferson City, MO 65102-0360

5 April 2010

### **RE: Rate Case EX-2010-0169**

Dear Commissioners,

Thank you for the opportunity to comment on the Renewable Energy Standard rulemaking.

My company fully supports the MOSEIA comments as necessary to create a viable solar industry in Missouri. Our company is ready to build many solar facilities with a solar REC value that establishes payback periods as recommended by MOSEIA. These payback periods are required by the potential clients we talk to before they will invest in solar systems. I would particularly like to emphasize the following MOSEIA recommendations;

1. MOSEIA has recommended a method of establishing and maintaining the SREC value that is simple, transparent, based on common financial practices, and allows the PSC to easily guide the solar market as it develops. More complicated methods could be employed, but the payback method proposed is an ideal balance of sophistication, simplicity, and ease-of-use. Adopt the payback method so that we can monitor our progress and steer the market steadily and smoothly toward our RES goals.
2. Geographic Sourcing. It is better for Missouri ratepayers if the full effects of Proposition C occur within Missouri. Renewable generation in Missouri--and solar in particular--is the intent, so please make sure the SRECs come from Missouri to the greatest extent possible. Ensuring that renewable installations are in or near Missouri will create jobs and economic development in Missouri. We should use distribution lines as a means to confirm that electricity goes to Missouri customers.
3. The Standard Offer Contract is an important tool in pursuing and meeting our Renewable Energy Standard targets. The recommendations submitted by MOSEIA will optimally leverage the benefits of the Standard Offer Contract. The one-time lump sum payment for SREC's is very important for small systems under 25kW. I urge you to adopt those recommendations.
4. A precise and appropriate definition of Customer-Generator will open the door to renewable generation for many Missourians who might not otherwise be able to participate. Implement the change recommended by MOSEIA.
5. Enforce the legally required solar carve-out for ALL Investor-owned utility customers by removing the now-obsolete exemption language in section 9.

Thanks again for your dedication and service.

Sincerely,

Vaughn Prost. P. E.

C.E.O.