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Missouri Public Service Commission
Morris L. Woodruff, Secretary of the Commission
PO Box 360
Jefferson City, MO 65102

SUBJECT: **Case No. EX-2014-0352:** In the Matter of Proposed Amendment of 4 CSR 240-20.065 and 4 CSR 240-20.100, Regarding Net Metering and Renewable Energy Standard Requirements
WIND ON THE WIRES CORRECTED COMMENTS

Dear Mr. Woodruff:

I am writing to submit Wind on the Wires' CORRECTED COMMENTS in the above referenced case regarding the Proposed Amendment to the Electric Utility Renewable Energy Standard Requirements ("Proposed Amendment") rule 4 CSR 240-20.100 published in the Missouri Register (Vol. 40, No. 9) on May 1, 2015.

Wind on the Wires is a not-for-profit, collaborative organization dedicated to wind energy's fair access to the electric transmission system and market in the Midwest Region. Our Board of Directors and members are comprised of wind developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry, some of whom have offices in or provide services within Missouri.

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I. Overview of Comments

Wind on the Wires' comments address the following portions of the rule:

- This submission supports the need for a uniform, transparent process for utilities to follow in determining the retail rate impact defined in section 5.
- This submission recommends the use of a uniform, transparent methodology for calculating the ten year forward look described in section 5(B), instead of creating a

carry-forward provision (described in Proposed Amendment section 5(G)) that is inconsistent with the retail rate impact test described in section 5(B). An example spreadsheet is provided as Attachment A -- "Retail Rate Impact Analysis using 10 Year Forward Average" ("WOW Attachment A").

- If the Commission finds merit in the use of a carry-forward provision, this submission recommends an alternative to that attached in section 5(G) of the proposed rule, and that is consistent with the retail rate impact test as approved in sections 5(A) and (B). An example spreadsheet is provided as Attachment B -- "Retail Rate Impact Analysis using 10 Year Forward Period and Period in Which Actual Costs Have Been Incurred" ("WOW Attachment B").
- This submission recommends clarifications to the definitions of "non-renewable generation and purchased power resource portfolio" defined in section 5(B). A "non-renewable generation and purchased power resource portfolio" should be the base revenue requirement excluding the costs of all renewable resources and including the costs of non-renewable generation that replaces the renewable resources and the addition of non-renewable generation sufficient to meet the utility's needs on a least cost basis for the next ten years.
- This submission recommends that the "avoided costs" described in section 5(B) also include savings from avoided cost of: fuel for generation that is offset by renewable energy required by the RES Portfolio Requirement, reduced operations and maintenance of existing non-renewable generation, and avoided additions of new non-renewable generation.

- This submission notes that the "renewable mandates required by law" edit in section 2(B) could be interpreted as including costs of mandates that are not within the scope of the RES and that may run counter to section 5(E).
- This submission notes that section 5(E) is missing from the rule published in the Missouri Register; it is not included as existing language nor is it stricken from the rule.
- This submission recommends that the complaint process used for curing deficiencies in the RES Compliance Plans and Reports filed by electric utilities would be more administratively efficient if the order to cure the deficiencies were made within the docket in which plan or report was filed, instead of through a complaint case that has been known to take well over a year to conclude.

II. The Retail Rate Impact Analysis

Since the inception of the Renewable Energy Standard rule ("RES rule") there has been multiple views on how to calculate the Retail Rate Impact. Wind on the Wires supports the idea of making that calculation uniform, open and transparent for all of the utilities and believes the ten year forward looking average can accomplish that goal. The 10 year forward looking average, as described in sections 5(A) and (B), is sufficient to prevent a retail rate increase of more than 1% because it evaluates the retail rate impact of the renewable resources that would be used for compliance in those years. Thus, we have attached a spreadsheet that provides a uniform 10 year forward averaging (WOW Attachment A) that we ask the Commission adopt as a template for calculating the Retail Rate Impact Analysis. This would ensure it is calculated in a uniform, open and transparent manner and would be consistent with section 5(A) and (B) of the current RES rule.

We do not support the "carry-forward" calculation described in section 5(G) of the Proposed Amendment. The structure of the carry-forward provision is inconsistent with the Retail Rate Impact Analysis that was approved by the Commission and set forth in sections 5(A) and (B) of the current rule. While we believe the ten year forward evaluation of the retail rate impacts is sufficient to protect Missouri ratepayers, if the Commission determines that the retail rate impact analysis should also include an evaluation of what the utility has done in the years prior to the Planning Year, we have prepared a spreadsheet that provides a uniform, open and transparent calculation of the Actual Costs plus the ten year forward period (WOW Attachment B).

A. Template for the 10 Year Forward Looking Retail Rate Impact Calculation

In the prior rulemaking the Commission approved a Retail Rate Impact Analysis that averages the retail rate impact of the planning year and subsequent nine year period (totaling a ten year period for the forward looking average). (4 CSR 240-20.100(5)(A) and (B)). The Retail Rate Impact Analysis is a planning analysis tool to avoid the addition of renewable resources beyond an amount that would likely cause a retail rate impact of greater than one percent, as required by 393.1030.2(1) RSMo. The Analysis is suited for evaluating renewable energy resource options and making a prudent choice pursuant to the requirements and limitations of the Missouri RES. The way in which the Retail Rate Impact Analysis evaluates the retail rate impact of renewable energy resources used for compliance is by comparing the cost of the proposed RES Compliant Portfolio to that of a non-renewable generation and purchase power portfolio that would be used to provide the same amount of energy. The ten year forward looking average is to be based on a reasonable estimate of future costs. Properly

structured, the Retail Rate Impact Analysis would evaluate the renewable energy sources that would be used for compliance in each year and estimate the retail rate impact they would have in each year of the next ten years, even if the renewable resources had been procured prior to the Planning Year. The ten year forward averaging, used for the Retail Rate Impact Analysis, protects ratepayers because it estimates the costs of the renewable resources that will be used for compliance in the year in which they are used and uses that to provide a reasonable estimate of their retail rate impact.

Wind on the Wires has prepared a template spreadsheet for Commission consideration, WOW Attachment A, for calculating the Retail Rate Impact Analysis. The spreadsheet in WOW Attachment A is structured on the language in section 5(B) -- it estimates the retail rate impact for each year, of a ten year period, based on the renewable energy resources that would be used for compliance in that year. WOW Attachment A provides details that are lacking in the carry-forward proposal, such as the components of the Non-Renewable Energy Generation and PPA Portfolio and its costs that would be compared to the RES Compliant Portfolio and its costs.

Here are some of the key components of the spreadsheet. The RES Retail Rate Impact for a given year (WOW Attachment A, row 58) is the comparison of the total retail revenue requirement incorporating an incremental non-renewable generation and purchased power portfolio (WOW Attachment A, row 44) to the total retail revenue requirement including an incremental RES compliant generation and purchased power portfolio (WOW Attachment A, row 55), as is described in section 5(B). That comparison is the difference between an RES Compliant Portfolio's Revenue Requirement and that of the comparable Non-Renewable Energy Generation Portfolio Revenue Requirement, and that difference is divided by the Non-Renewable Energy Generation Portfolio Revenue Requirement (WOW Attachment A, rows 58

and 59). This is to be performed for the Planning Year and each of the nine years following the Planning Year. Section 5(A) requires the retail rate impacts for those ten years be averaged and that the result not exceed 1% (WOW Attachment A, rows 61 to 62).

B. The 10 Year Forward Looking Average is Sufficient to Protect Ratepayers

When the original rule was being crafted, an issue for the Commission was the period of time over which the statutorily required averaging should occur. (Final Order, Docket EX-2010-0169, Comment #34; *see also,* Mo. Reg., Vol. 35, No. 16 at 1190-91, Comment #34 (Aug. 16, 2010)). Staff had proposed a ten year forward looking period for the averaging of retail rate impacts. The Wind Alliance had proposed either a ten or twenty year period, Renew Missouri had proposed a twenty year period and other parties had supported a ten year period. The Commission decided that a ten year forward looking average was sufficient and it still is sufficient to protect ratepayers. (Id. at 1191). Since then, Missouri electric utilities have seldom, if ever, provided an open and transparent calculation of the retail rate impact in their annual report of compliance plan.

The ten year forward looking averaging still protects Missouri ratepayers and can continue to be used. The ten year averaging includes the costs of existing renewable resources and reasonable estimates of additional renewable resources needed for compliance with the RES Portfolio Requirements over that ten year period. Thus, any forward looking analysis will account for resources that were procured prior to the Planning Year and would be used in the current portfolio. More importantly, the ten year forward analysis gives a reasonable estimate of the retail rate impacts that will occur because it includes all of the renewable resources that

would affect rates. For example, a ten year power purchase agreement for landfill gas entered into in 2009 would be part of the RES Retail Rate Impact analysis for years 2011 through 2018.

The primary concern is that the average RES Retail Rate Impact between now and 2021 -- when the RES Portfolio Requirements reach their pinnacle -- is going to continue to be less than 1%. Since the RES Portfolio Requirement does not increase beyond 2021, future rate impacts are most likely going to be de minimis.

Thus, the ten year forward Retail Rate Impact Analysis will protect ratepayers because it calculates the retail rate impact using reasonable cost estimates of renewable resources for the years in which the resources would affect rates.

C. The "Carry-Forward" Proposal is Inconsistent with the Retail Rate Impact Analysis in Section 5(B) and Inflates the Cost of Renewable Energy Resources

The current rule defines the retail rate impact analysis as the difference between the total retail revenue requirement including an incremental RES compliant generation and the total retail revenue requirement incorporating an incremental non-renewable generation and purchased power portfolio. (Section 5(B)). This calculation "may not exceed one percent (1%) for prudent costs of renewable energy resources directly attributable to RES compliance." (Section 5(A)). The Proposed Amendment proposes a "carry-forward" provision that is described in section 5(G) and is illustrated in Attachment A of the Proposed Amendment.

The proposed carry-forward provision should not be used because it conflicts with the other provisions of the Rule. First, the inputs into "Baseline Revenue Requirement" and "Actual Costs" are not uniform, open or transparent. If the carry-forward methodology is to be used it should be calculated consistent with Sections 5(A) and (B), which would require a comparison of

the actual revenue requirement to what would have occurred if the renewable resources were removed and replaced with energy from non-renewable generation. Wind on the Wires Attachment B demonstrates how this would occur in a carry-forward proposal. See WOW Attachment B -- Modification to Proposed Amendment Attachment A: Proposed "Retail Rate Impact Analysis using 10 Year Forward Period and Period in Which Actual Costs Have Been Incurred," rows 34 to 56.

A second reason the carry-forward proposal is inconsistent with the Retail Rate Impact Analysis defined in section 5(B) of the current rule is the use of the 1% adder. The methodology set forth in proposed section 5(G) simply sums the total dollar amount spent on renewable resources and compares it to a 1% adder on the "Baseline Revenue Requirement." That 1% adder is supposed to be the revenue requirement for Non-Renewable Generation and PPA portfolio described in section 5(B), however, the Commission has decided that section 5(B) is not a 1% adder methodology. In the last rulemaking, Ameren proposed that a 1% adder methodology, similar to the carry-forward proposal, be used. Ameren proposed that the RES Retail Rate Impact test be 1% of the last approved revenue requirement in a rate proceeding (Final Order, Docket EX-2010-0169, Comment #34). The Commission, instead, approved a RES Retail Rate Impact test that was a comparison of a RES Complaint Generation portfolio revenue Requirement to that of a Non-Renewable Generation and PPA Portfolio. Thus, the use of a 1% adder as part of the carry-forward proposal amount would be inconsistent with section 5(B) of the current rule.

A third problem with this proposal is it inflates the costs of renewable resources. Proposed Amendment section 5(G) states that the carry-forward provision is the simple accumulation of differences between the cost of the RES-compliant portfolio and the non-

renewable and PPA portfolio in every year. This proposed carry-forward methodology inflates the cost of the renewable resources, causing retail rates to prematurely hit the 1% retail rate impact limit. This occurs because the proposed methodology fails to remove (i.e., subtract) the cost of renewable resources in years when they are not being used for compliance. For instance, if a utility purchases one year S-RECs for compliance in 2013, the cost for those resources should be included in the retail rate impact analysis for the year in which they are used for compliance -- 2013 -- but not in other years. The carry-forward proposal adds in those costs, but then never subtracts them. Another example would be if a renewable resource is used for compliance from 2008 through 2015. That resource's costs would be part of the utility's annual revenue requirement from 2011 through 2015, but not in the years thereafter.

A fourth problem with the proposed carry-forward methodology is that the positive or negative carry-forward amount is to be accumulated for the years prior to the Planning Year and that amount included in (added into) the cost of the RES-compliant portfolio in the Planning Year. (Proposed Amendment §5(G)). As explained above, the methodology for calculating the carry-forward amount is different than the RES Retail Rate Impact Analysis described in section 5(B); therefore, the positive or negative carry-forward amount is incompatible with the values in the section 5(B) calculation. Thus, it cannot be added into the section 5(B) analysis.

Moreover, absent supporting testimony/comments it is unclear from the Proposed Amendment how the "10 Year Budget," the "Cumulative Budget," and "Cumulative Actual" amounts, that are denoted in Proposed Amendment Attachment A, are to be used by the utility for planning or in the Retail Rate Impact Analysis. In addition, it is unclear how the averaging that is performed in the final spreadsheet/table of WOW Attachment A is to be used. We look forward to seeing further clarification of these items in Staff's comments.

For the foregoing reasons, we recommend that the carry-forward provision be stricken, and instead, that the Commission approve the Retail Rate Impact Analysis that we provide in WOW Attachment A.

PROPOSED LANGUAGE REVISION to Sections 5(B) and (G):

> The utility shall calculate the RES retail rate impact for the planning year and the nine years thereafter using the methodology illustrated herein as Attachment A. The RES retail rate impact shall be determined by subtracting the total retail revenue requirement incorporating an incremental non-renewable generation and purchased power portfolio from the total retail revenue requirement including an incremental RES-compliant generation and purchased power po1tfolio. The non-renewable generation and purchased power portfolio shall be determined by adding, to the utility's existing generation and purchased power resource po1tfolio **excluding all renewable resources**, additional non-renewable resources sufficient to meet the utility's needs on a least-cost basis for the next ten (10) years. The RES-compliant portfolio shall be determined by adding to the utility's existing generation and purchased power resource portfolio an amount of least cost renewable resources sufficient to achieve the *[standard]* **portfolio requirements** set forth in section (2) of this rule and an amount of least-cost non-renewable resources, the combination of which is sufficient to meet the utility's needs for the next ten (10) years. These*[se]* ~~**cost of the RES-compliant portfolio shall also include the positive or negative cumulative carry-forward amount as determined in Section (5)(G). Assumptions regarding projected**~~ renewable energy resource additions will utilize the most recent electric utility resource planning analysis. These comparisons will be conducted utilizing *[projections of the]* incremental revenue requirement for new renewable energy resources, less the avoided fuel not purchased for non-renewable energy resources due to the addition of renewable energy resources.
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> ~~**(5)(G) The utility shall calculate for each actual compliance year an annual carry-forward amount, illustration included herein as Attachment A. This amount shall be calculated as the positive or negative difference between the actual costs of RES compliance and an amount equal to 1% of the revenue requirement for that year for the non-renewable generation and purchased power portfolio from its most recent annual RES compliance plan filed pursuant to Section**~~

~~(7)(B) of this rule. The positive or negative annual carry-forward amount shall be accumulated and carried forward from year-to-year and included in the cost of the RES-compliant portfolio for purposes of calculating the retail rate impact, as calculated in subsection (5)(B). Nothing in this subsection shall authorize recovery in excess of the 1% cap, as defined in section (5)(B).~~

D. Alternative to the Carry-Forward Proposal

If the Commission determines that the Retail Rate Impact Analysis should also evaluate what the utility has done in the years prior to the Planning Year, Wind on the Wires has prepared a spreadsheet that provides a uniform, open and transparent calculation of the Retail Rate Impact based on the Actual Costs and the ten year forward look (WOW Attachment B). This spreadsheet is the same format as the spreadsheet in WOW Attachment A, therefore, it conforms to the Commission's current language for Retail Rate Impact analysis in section 5(A) and (B), with a couple of minor additions. First, the Non-Renewable Generation and PPA Portfolio would include the Actual Revenue Requirement for those years prior to the Planning Year (WOW Attachment B, row 35). Second, the annual retail rate impact would be calculated for each year from 2011 through the ten year forward look period (WOW Attachment B, rows 59 and 60). Third, a section would be added for the average retail rate impact for 2011 through the ten year forward look period (WOW Attachment B, row 66).

PROPOSED LANGUAGE REVISION to Sections 5(B) and 5(G):

> The utility shall calculate the RES retail rate impact from 2011 through the the planning year and the succeeding ten year period using the methodology illustrated herein as Attachment A. The RES retail rate impact shall be determined by subtracting the total retail revenue requirement incorporating an incremental non-renewable generation and purchased power portfolio from the total retail revenue requirement including an incremental RES-compliant generation and purchased power portfolio. The non-renewable generation and purchased power portfolio shall be determined

by adding, to the utility's existing generation and purchased power resource portfolio **excluding all renewable resources**, additional non-renewable resources sufficient to meet the utility's needs on a least-cost basis for the next ten (10) years. The RES-compliant portfolio shall be determined by adding to the utility's existing generation and purchased power resource portfolio an amount of least cost renewable resources sufficient to achieve the *[standard]* **portfolio requirements** set forth in section (2) of this rule and an amount of least-cost non-renewable resources, the combination of which is sufficient to meet the utility's needs for the next ten (10) years. These*[se]* ~~**cost of the RES-compliant portfolio shall also include the positive or negative cumulative carry-forward amount as determined in Section (5)(G). Assumptions regarding projected**~~ renewable energy resource additions will utilize the most recent electric utility resource planning analysis. These comparisons will be conducted utilizing *[projections of the]* incremental revenue requirement for new renewable energy resources, less the avoided fuel not purchased for non-renewable energy resources due to the addition of renewable energy resources.

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~~**(5)(G) The utility shall calculate for each actual compliance year an annual carry-forward amount, illustration included herein as Attachment A. This amount shall be calculated as the positive or negative difference between the actual costs of RES compliance and an amount equal to 1% of the revenue requirement for that year for the non-renewable generation and purchased power portfolio from its most recent annual RES compliance plan filed pursuant to Section (7)(B) of this rule. The positive or negative annual carry-forward amount shall be accumulated and carried forward from year-to-year and included in the cost of the RES-compliant portfolio for purposes of calculating the retail rate impact, as calculated in subsection (5)(B). Nothing in this subsection shall authorize recovery in excess of the 1% cap, as defined in section (5)(B).**~~

III. Clarification of the Components of the "Non-Renewable Generation and Purchased Power Resource Portfolio"

Section 5(B) of the Proposed rule defines the "non-renewable generation and purchase power portfolio" to include "the utility's existing generation and purchased power resource

portfolio excluding all renewable resources, additional non-renewable resources sufficient to meet the utility's needs on a least cost basis for the next ten (10) years." (underscore emphasis added). The sentence defining "non-renewable generation and purchase power portfolio" could be understood to mean that additional non-renewable resources sufficient to meet the utility's needs are to be excluded. Moreover, a proper avoided cost calculation should include the cost of non-renewable resources that would be used to replace the renewable resources that are removed from the Base Revenue Requirement, so the definition should be adding not excluding/subtracting "the additional non-renewable resources sufficient to meet the utility's needs on a least cost basis for the next ten (10) years."

PROPOSED LANGUAGE REVISION to Section 5(B):

> The RES retail rate impact shall be determined by subtracting the total retail revenue requirement incorporating an incremental non-renewable generation and purchased power portfolio from the total retail revenue requirement including an incremental RES-compliant generation and purchased power po1tfolio. The non-renewable generation and purchased power portfolio shall be ~~determined by adding,~~ to the utility's base revenue requirement excluding the costs of all renewable resources and including the costs of non-renewable generation that replace the energy from the removed renewable resources and that are added~~ existing generation and purchased power resource po1tfolio excluding all renewable resources, additional non-renewable resources sufficient~~ to meet the utility's needs on a least-cost basis for the next ten (10) years.

IV. Avoided Costs Should be Expanded to Include Savings from Operations and Maintenance and Avoided Additions of Energy from New Non-Renewable Generation or Purchase Power Agreements

Section 5(B) of the Proposed Amendment limits avoided costs to "fuel not purchased for non-renewable energy resources due to the addition of renewable energy resources." This fails to account for savings the utility would receive from reduced operations and maintenance costs

of non-renewable generation that does not need to produce energy when the existing renewable resources are producing energy. In addition, the energy from new/proposed renewable energy resource that a utility uses as part of its compliance with the RES either replaces energy from or defers the need for new non-renewable generation. That cost savings should also be included in the revenue requirement for "non-renewable generation and purchase power portfolio" as part of avoided costs.

PROPOSED LANGUAGE REVISION to Section 5(B):

> The RES retail rate impact shall be determined by subtracting the total retail revenue requirement incorporating an incremental non-renewable generation and purchased power portfolio from the total retail revenue requirement including an incremental RES-compliant generation and purchased power po1tfolio. The non-renewable generation and purchased power portfolio shall be determined by adding, to the utility's existing generation and purchased power resource po1tfolio excluding all renewable resources, additional non-renewable resources sufficient to meet the utility's needs on a least-cost basis for the next ten (10) years. The RES-compliant portfolio shall be determined by adding to the utility's existing generation and purchased power resource portfolio an amount of least cost renewable resources sufficient to achieve the *[standard]* portfolio requirements set forth in section (2) of this rule and an amount of least-cost non-renewable resources, the combination of which is sufficient to meet the utility's needs for the next ten (10) years. *The[se]* cost of the RES-compliant portfolio shall also include the positive or negative cumulative carry-forward amount as determined in Section (5)(G). Assumptions regarding projected renewable energy resource additions will utilize the most recent electric utility resource planning analysis. These comparisons will be conducted utilizing *[projections of the]* incremental revenue requirement for new renewable energy resources, less the following costs avoided due to the addition of renewable energy resources: operations and maintenance of non-renewable energy resources, fuel not purchased for non-renewable energy resources ~~due to the addition of renewable energy resources~~ and deferral of the cost of energy from either new non-renewable generation or purchase of energy from non-renewable resources.

V. Reference in Section 2(B) to ”Renewable Mandates” is Broad and Vague and a Similar Concern is Already Adequately and Sufficiently Addressed in Section 5(E)

The Proposed Amendment revises section 2(B) such that the costs of complying with any renewables mandates or laws other than the Missouri RES would be included in the retail rate impact analysis. This revision could be incorrectly interpreted as including the costs of mandates that are not applicable to or within the scope of the state RES into the Retail Rate Impact Analysis. Moreover, section 5(E) already addresses this issue in a clear and concise statement, which is as follows:

> Costs of benefits attributed to compliance with a federal renewable energy standard or portfolio requirement shall be considered as part of compliance with the Missouri RES if they would otherwise qualify under the Missouri RES without regard to the federal requirements.

Thus, Wind on the Wires recommends that reference to “renewable mandates” be removed from section 2(B).

PROPOSED LANGUAGE REVISION to Proposed Section 2(B):

> *([E]**B**)* If compliance with ~~**renewable mandates required by law such as**~~ the *[above]* RES *[and RES solar energy]* **portfolio** requirements would cause **the** retail rates **of an electric utility** to increase on average in excess of one percent (1%) as calculated per section (5) of this rule, the**n** *[above requirements]* **compliance** ~~**with those mandates**~~ shall be limited *[to providing renewable energy in amounts that]* **so that** ~~**the cost of them would not cause**~~ retail rates **of the electric utility** ~~to~~ would not increase on average one percent (1%) as calculated per section (5) of this rule.

VI. Section 5(E) of the Rule has Been Omitted from the Proposed Amendment

Section 5(E) of the current rule is missing from the Proposed Amendment. It is not included as existing language nor is it stricken from the rule.

Wind on the Wires recommends the Commission clarify the status of section 5(E). If the section has been stricken, parties should be given an opportunity to comment on the rationale for said action.

VII. Curing Deficiencies in Annual Compliance Reports and Plans

There currently is no efficient regulatory process for parties, other than the utility, to correct deficiencies in a utility's annual compliance report or plan. The current process requires parties to cure deficiencies through a complaint. (Section (8)(A) and 4 CSR 240-2.070(1)). Experiences with this process[1] has shown it to be time consuming -- sometimes taking longer than 24 months to complete -- which is administratively burdensome on parties when the deficiencies could be addressed through the comment process afforded through section (7)(E) of the current rule.

Therefore, we recommend that any deficiencies in a compliance plan or compliance report (see sections (8)(A) and (B)) identified in comments (filed pursuant to section (8)(E)) be evaluated by the Commission for correction in the docket opened pursuant to section 8(C). The Commission would then issue an order approving the report and plan with corrections it deems appropriate in that docket, and direct the utility to file an updates report or plan that is compliant with the Order.

VIII. Conclusion

The comments and spreadsheets Wind on the Wires has provided are intended to help ensure that the Retail Rate Impacts Analysis is properly performed in an open, transparent and

[1] Complaints about electric utility compliance plans and reports have been filed in EC-2013-0377, EC-2013-0378, EC-2013-0379, EC-2013-0380, EC-2013-0381 and EC-2013-0382.

uniform manner so Missouri ratepayers interests in a 1% rate impact are protected. Wherefore, Wind on the Wires respectfully requests that the Commission make changes to the Proposed Amendment to 4 CSR 240-20.100 Electric Utility Renewable Energy Standard Requirements consistent with our comments, recommendations and proposed language revisions provided herein.

Sincerely,

_____/s_____
Sean R. Brady

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