

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

In the Matter of a Working Case to Consider)
Best Practices for Recovery of Past-Due Utility) File No. AW-2020-0356
Customer Payments After the COVID-10)
Pandemic Emergency)

COMMENTS OF CLEAN GRID ALLIANCE

On May 13, 2020 the Missouri Public Service Commission opened this working file to collect comments on how utilities will address the economic disruptions to their operations caused by COVID-19. The Commission directed Staff “to investigate this question and *any other relevant concerns* arising from COVID-19 pandemic emergency and to submit a report regarding its findings.” Within the scope of *other relevant concerns* Clean Grid Alliance suggests that the Commission investigate how utilities could contribute to Missouri’s economic recovery from the COVID-19 pandemic.

Clean Grid Alliance (“CGA”) is a non-governmental, non-profit whose primary focus is state energy policy, grid operations and market opportunities at Midcontinent Independent System Operator (“MISO”), transmission planning, and conducting broad education and outreach activities to ensure there are ample opportunities for utility-scale renewable resources (wind, solar and battery storage) to participate in the energy marketplace. CGA was founded in 2001. CGA is a member driven organization in which half its members are non-governmental organizations and consultants that support the increased use of utility-scale renewable resources, and half are companies that build and operate utility-scale wind/solar/battery storage resources.

This pandemic is trying the fabric of our society, our economy, and hampering the livelihood of a large portion of America. CGA applauds the Commission’s decision to proactively investigate how the pandemic is impacting both utilities and ratepayers so as to ensure a smooth and rapid transition to normalcy within Missouri. The questions posed by Staff primarily focus on the manner in which utilities continue to operate and maintain their electric or gas service, manage employee layoffs, collect payments or past due amounts, whether there has been any costs savings related to reduced operations and maintenance, and whether the utility is able to assist the vulnerable or low-income. What has been overlooked in the questions and approach is how utilities could be early-movers in Missouri’s economic rebound.

A recent “survey of the damage” caused by COVID-19, performed by The Missouri Chamber Foundation, revealed that 50% of employers expect to temporarily lay off employees, 17% expect to permanently lay off employees, and 15% of businesses expect to permanently close.¹ Through May 2, 36.5 million people in America had filed for unemployment and 543,029 in Missouri.² Loss of jobs also means loss of health care. To aid in rebuilding Missouri’s economy, one of the Chamber Foundation’s recommendations is “long-term investment in Missouri’s utility infrastructure . . . that drive[s] greater resiliency, rate affordability and economic development opportunities.”³

Utilities are engines of economic growth. They typically employ thousands of employees, and hire thousands of contractors. They routinely and continuously operate, maintain and

¹ Missouri Chamber Foundation, “Uniting for Recovery: A COVID-19 Economic Response Agenda” at 3; available at:https://www.kcsourcelink.com/docs/default-source/default-document-library/unitingforrecovery-economicresponseagenda.pdf?sfvrsn=2a16ca6f_2

² Timothy McBride, “opinion: The COVID-19 pandemic and the economic and policy challenges facing Missouri (May 18, 2020); available at: <https://themissouritimes.com/opinion-the-covid-19-pandemic-and-the-economic-and-policy-challenges-facing-missouri/>

³ Missouri Chamber Foundation, “Uniting for Recovery: A COVID-19 Economic Response Agenda” at 7; available at:https://www.kcsourcelink.com/docs/default-source/default-document-library/unitingforrecovery-economicresponseagenda.pdf?sfvrsn=2a16ca6f_2

construct infrastructure necessary for Missouri's economic welfare. They routinely plan and invest millions of dollars per year in infrastructure projects. Consequently, they can play a key role in the recovery of the economy.

An example of what Missouri could do is occurring in Minnesota. The Minnesota Public Utility Commission opened a docket in May to collect information from rate regulated utilities on the possibilities for investments that would assist in Minnesota's economic recovery.⁴ The Minnesota PUC requested information on all ongoing, planned or possible investments. Those investments needed to meet one or more defined conditions that would improve their state: improving gas or electric system benefits; reducing carbon emissions or pollutants; increasing conservation of resources; using clean energy resources; creating jobs or assisting in Minnesota's economic recovery; and utilizing minority or female owned businesses.⁵

The Minnesota PUC has seen a tremendous response from their utilities. In addition to describing activities that provide relief to customers, the utilities described a range of investments to accelerate or further the state's economic recovery. The projects that were submitted had estimated costs in the billions of dollars and would hire thousands of workers/laborers/contractors. Examples of proposed projects include, transmission investments, distribution system investments, non-wires alternative projects, gas system improvements, acceleration of solar photovoltaic plant and battery storage additions, creation of solar pilot programs, expansion and optimization of electric vehicle infrastructure, develop programs that would accelerate adoption of electric vehicles, acceleration of work to remove structures and equipment from retired plants, and solicitation of bids to build new wind resources or purchase wind energy while tax credits are still

⁴ Minnesota Public Utility Commission Docket No: CI-20-492.

⁵ Docket No: CI-20-492, Notice (May 20, 2020); available at: <https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={B0B43272-0000-C315-A7F1-CDCA83BC9913}&documentTitle=20205-163345-01>.

available. After receipt of the filings the Minnesota PUC will establish a process to further review and evaluate the projects.

Missouri should seize this opportunity to determine whether its utilities can provide near term projects that are economically beneficial for Missouri and compliant with the Public Service Commission Law (RSMO. 386.010 et seq.).

Respectfully submitted pursuant to the Commission's order.

/s/ Sean R. Brady

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been emailed to the parties of record on this the 15th of July, 2020.

/s/ Sean R. Brady

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