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Exhibit No.:  
Issues: Solar rebates  
Witness: Brenda Wilbers  
Sponsoring Party: Missouri Department of  
Economic Development –  
Division of Energy  
Type of Exhibit: Surrebuttal Testimony  
Case No.: ET-2014-0085

**SURREBUTTAL TESTIMONY**  
**OF**  
**BRENDA WILBERS**  
**MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT**  
**DIVISION OF ENERGY**  
**NOVEMBER 1, 2013**  
**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**  
**AMEREN MISSOURI'S APPLICATION**  
**TO SUSPEND SOLAR REBATE TARIFFS**  
**CASE NO.ET-2014-0085**

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

In the Matter of Ameren Missouri's )  
Application for Authorization to Suspend )  
Payment of Certain Solar Rebates )

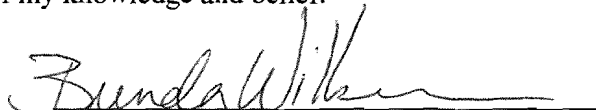
Case No. ET-2014-0085

**AFFIDAVIT OF BRENDA WILBERS**

STATE OF MISSOURI )  
 ) ss  
CITY OF JEFFERSON )

Brenda Wilbers, of lawful age, being first duly sworn, deposes and states:

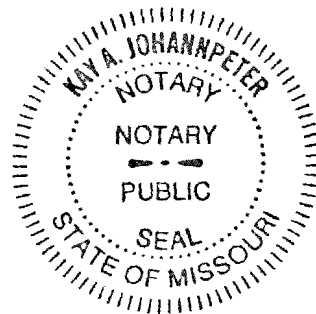
1. My name is Brenda Wilbers. I am employed by the Missouri Department of Economic Development -- Division of Energy as Program Director.
2. Attached hereto and made a part hereof for all purposes is my Surrebuttal Testimony on behalf of the DED Division of Energy.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.



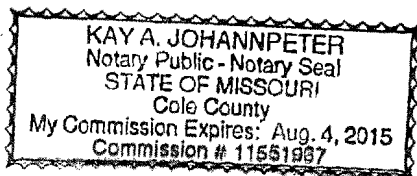
Brenda Wilbers

Subscribed and sworn to before me this 15<sup>th</sup> day of November 2013.

  
Notary Public



My commission expires:



1 **Q. Please state your name and business address.**

2 A. My name is Brenda Wilbers. My business address is 1101 Riverside Drive,  
3 Jefferson City, MO 65101.

4  
5 **Q. By whom are you employed and in what capacity?**

6 A. I am Program Director with the Missouri Division of Energy. Effective August 28,  
7 2013 the Division of Energy was transferred from the Department of Natural  
8 Resources to the Department of Economic Development by Governor Nixon's  
9 Executive Order 13-03 issued on February 4, 2013.

10  
11 **Q. Please describe your education and experience.**

12 A. I have 22 years of experience in energy and environmental policy with the  
13 Department of Natural Resources (DNR) and DNR Director's Office and I am  
14 currently responsible for two program areas in the Division of Energy: energy  
15 policy and energy efficiency programs. I have degrees in Business Administration  
16 from Lincoln University and a Master of Public Administration from the University  
17 of Missouri-Columbia.

18  
19 **Q. What is the purpose of your testimony?**

20 A. To respond to rebuttal testimony of several parties, primarily Mr. Glueck and  
21 Dr. Hausman.

22  
23 **Q. Dr. Hausman expressed concerns with including the costs of future wind**  
24 **projects in Ameren's integrated resource plan in 2018 and beyond in the**  
25 **calculation of retail rate impact (RRI).<sup>1</sup> What is your response?**

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<sup>1</sup> Rebuttal testimony, Dr. Hausman, pg.16-17

1 A. Rigid interpretation and application of the PSC's Renewable Energy Standard  
2 (RES) rule regarding calculation of the rate impact of compliance may not  
3 adequately consider the market realities or implications of the RRI calculation,  
4 especially in light of the link to integrated resource planning (IRP). The  
5 changeability and uncertainty of preferred resource plans are built into the  
6 Commission's IRP rule where "if the utility determines that the preferred resource  
7 plan or acquisition strategy is no longer appropriate," the plan can be changed with  
8 a 60-day filing.<sup>2</sup> A utility's preferred resource plan may include the acquisition of  
9 renewable energy in future years, but the utility may change the preferred plan  
10 prior to such acquisition due to any number of factors, including planned and  
11 unplanned-for contingencies and management decisions. Projected renewable  
12 energy additions in an IRP, therefore, involve significant uncertainty.

13  
14 **Q. Do you agree with the concerns that Mr. Glueck stated regarding the**  
15 **solar industry in Missouri and the significant ramifications of a Commission**  
16 **decision in this case?**

17 A. Generally, the motivation for a renewable energy standard is to encourage the  
18 increased use of renewable energy resources to generate power above and  
19 beyond the status quo. The solar rebate provisions of Missouri's RES are resulting  
20 in actual solar installations in the state, with associated energy savings,  
21 environmental benefits, jobs and economic activity. The negotiated terms of HB  
22 142 acknowledge and confirm that the solar installation boom days are likely a  
23 short-term proposition absent other developments. However, the termination of  
24 rebates so soon after HB 142's terms were negotiated with the solar industry  
25 would negate the orderly phase-out that was intended.

26  

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<sup>2</sup> 4 CSR 240-22.080(12)

1 According to the Missouri Partnership, a nonprofit economic development  
2 organization, Missouri solar installations have increased from 101 kilowatts in  
3 2009 to over 7.8 megawatts (MW) in 2011, more than a 7,000% increase in three  
4 years.<sup>3</sup> Mr. Glueck's testimony, which presumably accounts for additional years'  
5 data, states that Missouri has installed over 25 MW of distributed solar generation  
6 since Missouri voters approved the RES in November 2008.<sup>4</sup> The Missouri Solar  
7 Energy Industry Association (MOSEIA) reports at least 30 Missouri solar  
8 installation businesses and a Missouri ranking of 6th in the country for solar jobs  
9 with over 1,200 Missourians working in the solar industry. This economic growth is  
10 undoubtedly largely attributable to Missouri's RES solar rebate requirement. Many  
11 Missourians have embraced the solar option and committed themselves  
12 financially. Therefore, it is important that a determination by the Commission on  
13 whether the 1% RRI has been reached is based on accurate and reliable  
14 information and applied in a manner that is consistent with the policy behind the  
15 RES.

16

17 **Q. What are these concerns and what are the implications?**

18 A. The Missouri Division of Energy is concerned that the Commission is being  
19 asked to make a determination to discontinue all solar rebates in the Ameren  
20 Missouri service territory with potentially adverse impacts on Missouri's solar  
21 energy industry and consumers who have invested in solar energy installations in  
22 anticipation of a solar rebate. Such determination will rely on an untested model  
23 being used for the first time with this round of RES compliance filings. There are  
24 several questions related to the RRI calculation (including the appropriate method  
25 for scale-down if the cap is reached), different interpretations of the process and

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<sup>3</sup> <http://www.missouripartnership.com/Industries/Energy-Solutions/CategoryID/13>

<sup>4</sup> Rebuttal testimony, Mr. Glueck, pg. 2

1 data inputs used for the calculation, and questions regarding the proper  
2 categorization and accounting for solar rebate costs. The Commission staff itself  
3 once stated that it “considers the level of detail required for the rate impact  
4 calculation to be subjective” in dismissing the need for Ameren to perform the  
5 calculation in the 2012 RES compliance plan filing, and Staff recommended that a  
6 waiver should be granted even though not requested.<sup>5</sup> The Commission has at  
7 least the flexibility exercised and recommended by the Staff in 2012.

8  
9 **Q. What is your recommendation in this regard?**

10 A. The Missouri Division of Energy recommends consideration of a short-term  
11 approach that allows a reasonable ramp-down of solar rebates to occur, as  
12 contemplated by HB 142. This is appropriate due to the current circumstances  
13 including an unexpected announcement that the 1% RRI threshold would soon be  
14 reached and the use of a new model for the first-time calculation with data inputs  
15 that are disputed. This first application of the RRI calculation demonstrates the  
16 need for consideration of a more transparent process for such calculations and  
17 clarity on how the RRI calculation is to be performed. The Missouri Division of  
18 Energy concurs with Staff that an appropriate forum for the discussion and  
19 resolution of these issues is the HB 142 rulemaking workshop docket (Case No.  
20 EW-2014-0092). The Commission has an opportunity to temper the adverse  
21 implications for the Missouri customers who have embraced renewable energy  
22 installations in Missouri and the solar industry that would result from terminating  
23 solar rebates precipitously.

24 **Does this conclude your testimony?**

25 A. Yes.

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<sup>5</sup> Staff Report and Conclusion on Ameren Missouri’s 2012 Renewable Energy Standard Compliance Plan, May 31, 2012, pg. 5