



Commission should use this opportunity to explore and investigate a wide variety of ideas to move Missouri's energy policy forward.

### **Net Metering and Distributed Solar Generation**

Brightergy supported and advocated for the passage of the Senate Committee Substitute of Senate Bill 1028, filed during the 2016 regular session. Specifically, the new provisions codified in Section 386.891, which sets the net metering cap at 300 KW, and Section 393.1610, dealing with solar rebates. These additions will encourage Missourians living and working in investor-owned utility territory to invest in distributed generation assets.

The Company would continue to support this legislation should it, or a substantially similar version, be introduced in the upcoming legislative session.

The draft legislation proposed by the Chairman in this docket does not include these specific statutory sections. Brightergy encourages the Commission, should it promote specific legislation, to include the net metering and solar provisions so as to promote adoption of distributed generation assets.

The Chairman's proposal does include innovative ideas which would advance Missouri energy policy in a positive direction. Specifically, adding the integration of distributed and renewable resources as pillars of the new performance metric scheme will go a long way toward encouraging utilities to diversify away from large fossil fuel dependant central generation. The legislation could further encourage this shift by creating a distinct category with accompanying metrics for these areas, which would require utilities to make measurable progress in these areas in particular, and provide adequate compensation for that investment.

### **Customer Access to Data**

One often overlooked policy change that has the potential to drive innovation and adoption of new energy technology is customer access to data. Most stakeholders interested in the Missouri energy policy debate seem to agree that a regulated utility's revenues should be tied to its performance under certain metrics. Adding customer access to data as a metric under the proposed Section 393.336.9.

Energy customers are beginning to enjoy choices that have not previously been available. Not only can a customer install distributed generation assets and energy efficiency hardware, but they can now take advantage of increasingly useful smart thermostat technology, appliance monitoring and remote access. All of these technologies will change the way consumers purchase energy and interact with their utility providers, but without access to real-time data, customers will be making those choices without the relevant necessary information.

A ratepayer with comprehensive knowledge of energy consumption will be a much better consumer of energy services, and a much more helpful partner to the utilities, which face increasing pressure to reduce load and become more efficient.

Utilities may be understandably concerned about liabilities related to the release of customer data. Utilities and customers alike should have assurances that privacy will be protected, and that the utility provider will not face legal risk related to the release of usage data under an approved rule.

Recent coverage<sup>2</sup> has noted the link between customer access to, and awareness of, time of use and other information relevant to energy consumption and increased participation in energy efficiency programs. This is a simple policy change that will advance Missouri's energy policy goals at little or no cost to utilities and ratepayers.

Brightergy encourages the Commission to explore customer access to data as an important component of its regulatory changes.

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<sup>2</sup> Lyderson, Kari. "Q&A: Unlocking energy-use data has vast efficiency potential, researcher says." *Midwest Energy News*, July 1, 2016.

## **Conclusion**

Brightergy looks forward to continued participation in this docket, and encourages the Commission as well as the other stakeholders to include net metering changes, solar rebates and customer use data as important parts of Missouri's energy policy. These

Respectfully submitted,

*/s/ Andrew Zellers*

Andrew Zellers MO. Bar No. 57884

General Counsel and Vice President for Regulatory Affairs

Brightergy, LLC

1712 Main Street, 6th Floor, Kansas City, MO 64108

andy.zellers@brightergy.com

office: +1.816.866.0555

fax: +1.888.511.0822

**Attorney for Brightergy, LLC**

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically this 8th day of July, 2016, via the Commission's EFIS system.

*/s/ Andrew Zellers*