

**STATE OF MISSOURI
PUBLIC SERVICE COMMISSION**

At a session of the Public Service Commission held at its office in Jefferson City on the 6th day of April, 2017.

In the Matter of Ameren Missouri's Request for)	
Approval of a Revised Net Metering Tariff and for)	File No. EE-2017-0235
Variances from Certain Provisions)	Tracking No. JE-2017-0174
of 4 CSR 240-20.065 Regarding Net Metering)	

ORDER APPROVING APPLICATION

Issue Date: April 6, 2017

Effective Date: April 18, 2017

Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri") filed the application, with accompanying tariff sheets,¹ some of which it later substituted and withdrew ("tariffs"). The Commission received responses from the Office of the Public Counsel ("OPC")² and the Commission's staff ("Staff").³ The Commission also received a reply from Ameren Missouri.⁴

The application and tariffs seek variances from the Commission's net metering⁵ regulation.⁶ That regulation requires,⁷ in prescribed⁸ language,⁹ an "interconnection application/agreement." The interconnection application/agreement is necessary for a

¹ Electronic Filing Information System (EFIS") No. 1 (March 13, 2017) *Request for Variances from Certain Provisions of 4 CSR 240-20.065 and Tariff Revision*. All citations to EFIS refer to this File No. EE-2017-0235.

² EFIS No. 4 (March 23, 2017) *Office of the Public Counsel's Response*.

³ EFIS No. 5 (March 23, 2017) *Staff Recommendation*.

⁴ EFIS No. 9 (March 29, 2017) *Reply to OPC Response and Staff Recommendation; Substitute Tariff*.

⁵ Net metering means measuring the flow of electricity between an electric corporation and a customer who generates their own electricity. 4 CSR 240-20.065(1)(F).

⁶ 4 CSR 240-20.065.

⁷ 4 CSR 240-20.065(9).

⁸ 4 CSR 240-20.065(9)(A)1.A.

⁹ 4 CSR 240-20.065 *Interconnection Application /Agreement for Net Metering Systems with Capacity of One Hundred Kilowatts (100 kW) or Less*.

customer to receive a solar rebate under the Renewable Energy Standards regulation.¹⁰ The Renewable Energy Standards regulation allows a variance as follows.

Upon written application, and after notice and an opportunity for hearing, the commission may grant a variance from any provision of this rule for good cause shown. [¹¹]

“[A]ny provision of this rule” includes the net metering regulation’s interconnection application/agreement requirement,¹² because the Renewable Energy Standards regulations expressly incorporate that requirement.¹³ That requirement includes the prescribed language.¹⁴ Therefore, the prescribed language is also subject to a variance.

Ameren Missouri argues that the variances will clarify Ameren Missouri’s interconnection application/agreement, and will expedite processing, which will assist Ameren Missouri’s customers. Some of the variances sought have the support of Staff or OPC. OPC opposed none of the variances. Staff opposed one of the variances and Ameren Missouri agreed with Staff’s recommendation, withdrew that variance, and filed a substitute tariff omitting the variance language for uniformity with the other tariff sheets. Staff also opposed one of two alternatives for another variance and Ameren Missouri withdrew that alternative, the language of which never appeared in the tariffs. Therefore, no party opposes any of the remaining matters now pending before the Commission.¹⁵

¹⁰ 4 CSR 240-20.100(4)(L).

¹¹ 4 CSR 240-20.100 (11).

¹² 4 CSR 240-20.100(4)(L).

¹³ 4 CSR 240-20.100(4)(L).

¹⁴ 4 CSR 240-20.065(9)(A)1.A.

¹⁵ As set forth in the appendix to this order.

No evidentiary hearing is necessary to grant unopposed relief. ¹⁶ On the basis of the parties' filings, the Commission concludes that Ameren Missouri has shown good cause. Therefore, the Commission will approve the application.

An effective date of less than ten days from the date of issuance is presumptively insufficient for the exercise of post-decision rights and requires a showing of "extraordinary circumstances that clearly warrant further encroachment on the time provided to the parties in which to exercise" those rights.¹⁷ Therefore, the Commission will approve the application effective more than ten days from the issuance of this order and allow the tariffs to take effect by operation of law.

THE COMMISSION ORDERS THAT:

1. The *Request for Variances from Certain Provisions of 4 CSR 240-20.065 and Tariff Revision* is approved.
2. This order shall be effective on April 18, 2017.



BY THE COMMISSION

A handwritten signature in black ink that reads "Morris L. Woodruff".

Morris L. Woodruff
Secretary

Hall, Chm., Stoll, Kenney, Rupp, and
Coleman, CC., concur

Daniel Jordan, Senior Regulatory Law Judge

¹⁶ *State ex rel. Rex Deffenderfer Ent., Inc. v. Public Serv. Comm'n*, 776 S.W.2d 494, 496 (Mo. App., W.D. 1989).

¹⁷ *State ex rel. Office of Pub. Counsel v. Pub. Serv. Comm'n of State*, 409 S.W.3d 522, 529 (Mo. App., W.D. 2013).

Appendix: Variances

Request No.	Tariff Sheet Nos.	Variance Requested	OPC Response	Staff Recommendation	Ameren Missouri Reply
1	Multiple	Substitute the word "Company" in place of "Ameren Missouri"	No opposition		No change
2	171.6	Use the term "bi-directional meter" in place of "net meter" when the equipment is referenced rather than the billing methodology			
3		Replace "Inspection" with "Company's inspection" as appropriate to avoid confusion between inspections by the Company and local Authority Having Jurisdiction			
4		Revise language to reflect limited availability of solar rebates and complexity of the solar rebate queue (see <i>Stipulation and Agreement</i> in File No. ET-2014-0085)	No opposition	Support	No change
5	171.8	Interconnection Application/Agreement, Section B - Add clarity to information required regarding a disconnect switch and reduce the number of required Company-customer communications	No opposition		No change
6	171.9	Interconnection Application/Agreement, Section C - Delete "Person or Agency Who Will Inspect/Certify Installation..." given the definition of local Authority Having Jurisdiction in the revised statute	No opposition	Oppose	Substituted
7	171.11	Interconnection Application/Agreement, Section D.5. -Revise to either:			
a		"The Customer-Generator shall be responsible for all other bill components charged to similarly situated customers that are not Customer-Generators" or	No opposition		No change
b		Replace "customer charges" with "minimum bill"	Support	Oppose	Withdrawn
8	171.13	Interconnection Application/Agreement, New Section D.10. - Include a new section D.10. in compliance with the <i>Stipulation and Agreement</i> filed in File No. ER-2016-0179.	No opposition	Support	No change
9	171.17	Interconnection Application/Agreement, Section I - Delete language in the "Solar Rebate Declaration" and, after listing the potential rebate amounts, add a sentence directing customers to the Company's Rider SR-Solar Rebate at www.ameren.com.	No opposition	Support	No change

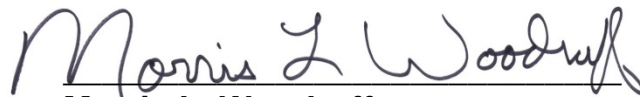
STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission,
at Jefferson City, Missouri, this 6th day of April 2017.




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

April 6, 2017

File/Case No. EE-2017-0235

**Missouri Public Service
Commission**

Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel

Hampton Williams
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opc@ded.mo.gov

Union Electric Company

Paula Johnson
1901 Chouteau Ave
St Louis, MO 63103
AmerenMOService@ameren.com

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.