

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

In the Matter of Ameren Missouri's Request)	
For Approval of a Revised Net Metering Tariff)	
And for Variances from Certain Provisions of)	<u>Case No. EE-2019-0027</u>
4 CSR 240-20.065 Regarding Net Metering)	YE-2019-0012

STAFF'S RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission ("Commission"), by and through the undersigned counsel, and states for its *Recommendation* as follows:

1. On July 30, 2018, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed revised net metering tariff sheets (Tracking No. YE-2019-0012) and concurrently filed its Request for Variances from Certain Provisions of 4 CSR 240-20.065, in which Ameren requested to continue eight variances previously granted by the Commission in EE-2017-0235, and a new variance request.

2. Ameren Missouri's new variance request is to remove the solar rebate application from the net-metering application.

3.) Staff supports the variance requests and recommends the associated tariff sheets be approved for service rendered on or after August 28, 2018.

WHEREFORE, Staff recommends the Commission grant the variance requests and approve the tariff sheets.

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers

Deputy Staff Counsel

Missouri Bar No. 66766

Attorney for the Staff of the
Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65012

(573) 751-6651 (Telephone)

(573) 751-9285 (Fax)

Nicole.mers@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, electronically mailed, sent by facsimile or hand-delivered to all counsel of record this 9th day of August, 2018.

/s/ Nicole Mers

MEMORANDUM

TO: Missouri Public Service Commission
Case No.: EE-2019-0027, File No.: YE-2019-0012
Ameren Missouri Request for Approval of a Revised Net Metering Tariff and for
Variances from Certain Provisions of 4 CSR 240-20.065

FROM: Claire M. Eubanks, PE, Engineering Analysis

/s/ Dan Beck 08/09/2018 /s/ Nicole Mers 08/09/2018
Engineering Analysis / Date Staff Counsel's Office / Date

SUBJECT: Staff Recommendation to Approve Revised Net Metering Tariff and Variance
from Certain Provisions of 4 CSR 240-20.065

DATE: August 9, 2018

OVERVIEW

Staff has reviewed the Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) Request for Approval of a Revised Net Metering Tariff and for Variances from Certain Provisions of 4 CSR 240-20.065 and associated tariff sheets filed on July 30, 2018. As a result of passage of 393.1670 RSMo., Ameren Missouri has requested to remove the solar rebate application sections from the “Interconnection Application/Agreement for Net Metering Systems with Capacity of 100 kW or Less.” The solar rebate tariff sheets related to 393.1670 RSMo., were filed separately, tracking number JE-2019-0011.

DISCUSSION

Variance:

Ameren Missouri outlines eight variance requests which were previously granted in EE-2017-0235. Additionally, Ameren Missouri requests a variance from 4 CSR 240-20.065 to remove the solar rebate application (Section H and I of the Interconnection Application/Agreement for Net Metering Systems with Capacity of 100 kW or Less) from the net-metering application. Staff supports the variance request for the following reasons:

- Customers receiving a solar rebate under 393.1670 may interconnect under the Net Metering tariff or the Company’s Qualifying Facility tariff. This is related to the size limitation for offering solar rebates to non-residential customers under

393.1670 RSMo., (150 kW) in comparison to the size limitation of the Net Metering and Easy Connection Act, 386.890 RSMo., (100 kW).

- There are potential efficiencies to be gained, in terms of Ameren Missouri's administration of the programs, from separating the solar rebate application from the net metering application.

Staff is still reviewing Ameren Missouri's filing made in JE-2019-0011 and will provide recommendations to the Commission regarding the solar rebate tariff sheets prior to the effective date of those sheets, August 28, 2018.

Tariff:

Staff recommends the following tariff sheets filed on July 27, 2018, be approved to become effective August 28, 2018:

P.S.C. MO. No. 7

4th Revised Sheet No. 171.4 Cancelling 3rd Revised Sheet No. 171.4

1st Revised Sheet No. 171.16 Cancelling Original Sheet No. 171.16

1st Revised Sheet No. 171.17 Cancelling Original Sheet No. 171.17

The Staff has verified that Ameren Missouri has filed its annual report and is not delinquent on any assessment.

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Variances from Certain Provisions of)
4 CSR 240-20-20.065 Regarding Net Metering)

Case No. EE-2019-0027

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

State of Missouri)
) ss
County of Cole)

COMES NOW Claire M. Eubanks, PE, and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached *Staff Recommendation*; and that the same is true and correct according to her best knowledge and belief.

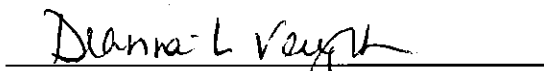
Further the Affiant sayeth not.



Claire M. Eubanks, PE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 9th day of August, 2018.



NOTARY PUBLIC

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 15207377