

Certified Solar Solutions, LLC

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Public Service Commission
PO Box 360
Jefferson City, MO 65102-0360

5 April 2010

RE: Rate Case EX-2010-0169

Dear Commissioners,

Thank you for your work and service to Missouri's utility customers. Thank you, especially, for your cooperation, diligence, conscientiousness, and inclusiveness during the Renewable Energy Standard rulemaking.

The comments submitted by MOSEIA have my full support and I would particularly like to emphasize the value of the following recommendations in those comments:

1. MOSEIA has recommended a method of establishing and maintaining the SREC value that is simple, transparent, based on common financial practices, and allows the PSC to easily guide the solar market as it develops. More complicated methods could be employed, but the payback method proposed is an ideal balance of sophistication, simplicity, and ease-of-use. Adopt the payback method so that we can monitor our progress and steer the market steadily and smoothly toward our RES goals.
2. Geographic Sourcing. It is better for Missouri ratepayers if the full effects of Proposition C occur within Missouri. Renewable generation in Missouri--and solar in particular--is the intent, so please make sure the SRECs come from Missouri to the greatest extent possible. Ensuring that renewable installations are in or near Missouri will reduce Missouri's load on the grid and our aging generation plants. We should use distribution lines as a means to confirm that electricity goes to Missouri customers.
3. The Standard Offer Contract is an important tool in pursuing and meeting our Renewable Energy Standard targets. The recommendations submitted by MOSEIA will optimally leverage the benefits of the Standard Offer Contract. I urge you to adopt those recommendations.
4. A precise and appropriate definition of Customer-Generator will open the door to renewable generation for many Missourians who might not otherwise be able to participate. Implement the change recommended by MOSEIA.
5. Enforce the legally required solar carve-out for ALL Investor-owned utility customers by removing the now-obsolete exemption language in section 9.

Thanks again for your dedication and service.

Sincerely,
Jason Parker
General Manager