

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

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(11) Net Metering)	
Standard as Required by Section 1251 of the)	Case No. EO-2006-0493
Energy Policy Act of 2005)	

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(14) Time-Based)	
Metering and Communications Standard as)	Case No. EO-2006-0496
Required by Section 1251 of the Energy Policy)	
Act of 2005)	

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(15) Interconnection)	
Standard as Required by Section 1251 of the)	Case No. EO-2006-0497
Energy Policy Act of 2005)	

**POSITION STATEMENTS OF EXPERT APPEARING ON
BEHALF OF THE EMPIRE DISTRICT ELECTRIC COMPANY**

In accordance with the "Order Establishing a Procedural Schedule for On-the-Record Presentations" issued on March 15, 2007, by the Missouri Public Service Commission, The Empire District Electric Company ("Empire"), hereby files the attached written position statements of David W. Gibson, who will appear on Empire's behalf at the on-the-record presentations scheduled for April 25, 2007, in the above-captioned dockets.

Respectfully submitted,

_____/s/_____
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ATTORNEYS FOR THE EMPIRE DISTRICT
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**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(15) Interconnection)
Standard as Required by Section 1251 of the) Case No. EO-2006-0497
Energy Policy Act of 2005)

**POSITION STATEMENT OF DAVID W. GIBSON
ON BEHALF OF THE EMPIRE DISTRICT ELECTRIC COMPANY**

1 The purpose of the EPAct Standard for interconnection was designed to make
2 interconnection service agreements available that are just and reasonable and not unduly
3 discriminatory or preferential. In addition, contracts and procedures for interconnection
4 reflect best practices for distributed generation.

5 The current interconnection standard that is used in Missouri by Empire has 4
6 customers which currently receive and generate energy on the system. The
7 interconnection services offered to the customer-generators are in compliance with the
8 requirements of Section 386.877, RSMo, and 4 CSR 240-20. Although the current
9 interconnection services are limited to customers who have a capacity of 100 kW or less,
10 customer-generators are not being turned away because of that limitation. The limitation
11 is also beneficial to Empire in that it allows the company to learn, with a manageable
12 number of customer-generators, about the impact they have on the system while ensuring
13 the safety and reliability of the current electric system.

14 One point of disagreement arises from the fact that IEEE Standard 1547 is not
15 mentioned in Section 386.877, RSMo or 4 CSR 240-20. While we agree that there is no
16 direct reference to IEEE Standard 1547, if it is interpreted that the generic requirement of
17 meeting the standards established by the Institute of Electrical and Electronics Engineers

1 encompasses IEEE Standard 1547, then there would not be a need to amend the current
2 statute.

3 A second point of disagreement arises in from the fact that it was intended that a
4 “uniform” interconnection standard was intended by the EPAct which would be provided
5 by IEEE Standard 1547. It should be noted that IEEE Standard 1547 does not provide for
6 uniform practices. In section 1.3 of IEEE Standard 1547 a listing of the limitations is
7 given and then it goes on to say “These limitations are items that must be addressed
8 during every installation; therefore, additional utility specific standards for installation of
9 these resources are required”.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 13TH day of April, 2007:

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