

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(16) Consideration))
of Smart Grid Investments Standard as Required))
by Section 1307 of the Energy Independence and))
Security Act of 2007.) Case No. EW-2009-0290

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(16) Integrated)
Resource Planning Standard as Required by))
Section 532 of the Energy Independence and))
Security Act of 2007.) Case No. EW-2009-0291

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(17) Rate Design)
Modifications to Promote Energy Efficiency))
Investments Standard as Required by Section))
532 of the Energy Independence and Security))
Act of 2007.) Case No. EW-2009-0292

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(17) Smart Grid)
Information Standard as Required by Section))
1307 of the Energy Independence and Security))
Act of 2007.) Case No. EW-2009-0293

**RESPONSE OF THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
TO STAFF'S MATRIX FOR PURPA SECTION 111(d)(16)-(19) STANDARDS**

Comes now the Missouri Department of Natural Resources, Energy Center (“MDNR-EC”) responding to the matrix filed by the Staff of the Missouri Public Service Commission (“Staff”) November 20, 2009. The matrix details the position of Staff regarding the Public Utility Regulatory Policies Act of 1978 (“PURPA”) Section

111(d)(16) - (19) standards, as established by Sections 532 and 1307 of the Energy Independence and Security Act of 2007 ("EISA"). MDNR-EC offers the following matrix of proposed forums for addressing the PURPA standards from previous MDNR-EC filings:

Energy Infrastructure Security Act (EISA) (PURPA § 111(d) (16) - (19) Standards:
As Proposed by the Missouri Department of Natural Resources - Energy Center

	SB 376 Docket	Chapter 22 Rule Revision	Other Docket/Rule-making	Rate Cases
Section 111(d)(16) (IRP Planning)	SB 376 addresses a portion of Standard 111(d)(16) to "adopt policies establishing cost-effective energy efficiency as a priority resource" by including a "goal of achieving all cost-effective demand-side savings" (393.1124.4). This should be recognized in Chapter 22 Rule Revision or addressed in SB 376 docket.	Incorporate provisions of this standard into future integrated resource planning (IRP) analysis		
Section 111(d)(17) (Rate Design and Energy Efficiency)	Standard 111(d)(17) provisions could be addressed in the docket to implement the provisions of SB			Implementation of standard and SB 376 provisions would be addressed in individual rate

	376.			cases (to be determined in SB 376 docket).
Section 111(d)(18) (Smart Grid Investments)			<p>Separate smart grid docket.</p> <p>Define “qualified smart grid system” and specify how to demonstrate to the Commission that the utility considered investments in a qualified smart grid system prior to undertaking investments in non-advanced grid technologies.</p>	Recovery of costs incurred by a utility for smart grid investments would be addressed in individual rate cases (to be determined in smart grid docket).
Section 111(d)(19) (Smart Grid Information)			<p>Separate smart grid docket.</p> <p>Note: One provision of this standard ((B)(iv) - annual sources of power and emissions reporting) could be addressed in the Renewable Energy Standard rulemaking docket (EW-2009-0324) or</p>	

			added to the annual reporting requirements of 4 CSR 240-3.165.	
--	--	--	--	--

MDNR offers this summary and hopes the Commission finds it to be useful in its review and consideration of the standards detailed in PURPA and the EISA. MDNR looks forward to the Commission's forthcoming Order providing additional procedural direction.

Respectfully submitted,

CHRIS KOSTER
Attorney General

/s/ Shelley A. Woods
SHELLEY A. WOODS
Assistant Attorney General
P.O. Box 899
Jefferson City, Missouri 65102
Bar No. 33525
573-751-8795
573-751-8796 (fax)
shelley.woods@ago.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 1st day of December, 2009.