

In the Matter of a Proposed )  
Amendment to 4 CSR 240-20.065, the )  
Commission's Net Metering Rule )

**Case No. EX-2012-0193**

## **STAFF EVALUATION OF RULE AMENDMENT COST IMPACT**

**COMES NOW** the Staff of the Missouri Public Service Commission and, in the attached memorandum, reports to the Commission its evaluation that the cost impact of the August 30, 2012, amendment to the Commission's Net Metering Rule 4 CSR 240-20.065 neither exceeds the estimated maximum of five hundred dollars in the aggregate for private entities nor the estimated maximum of five hundred dollars in the aggregate for public entities.

Respectfully submitted,

/s/ Nathan Williams

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## CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 11<sup>th</sup> day of August, 2015.

/s/ Nathan Williams

## MEMORANDUM

TO: Case File for Case No. EX-2012-0193

FROM: Daniel I. Beck, on Behalf of the Commission Staff

SUBJECT: Rule 4 CSR 240-20.065, Accuracy of Cost Estimates for Rule Implementation – Compliance with the Requirements of GP-1 of the Commission's General Procedures

DATE: August 11, 2015

The Commission Staff has investigated the cost of implementing the rule adopted by the Commission through this case, and reports that it has not discovered any information that would show that the cost estimate published in the *Missouri Register* was inaccurate in connection with the implementation of the amendment to Net Metering Rule 4 CSR 240-20.065, in Case No. EX-2012-0193.

Additionally, the Staff reports that it has not received any information from any party potentially or actually affected by the implementation of the subject rule that would show that the cost estimate published in the *Missouri Register* was inaccurate.

The Commission's General Procedure GP-1 (GP-1) requires, among other things, that within 30 days before the end of the first full fiscal year after the implementation of a rule, amendment or rescission, that the Staff is to investigate whether the cost to all affected entities, including the Commission, has exceeded by ten percent or more the estimated cost in the fiscal note, or, where appropriate, has exceeded five hundred dollars.

GP-1 also requires the Staff to prepare a memorandum showing the results of its investigation within thirty (30) days after the end of the first full fiscal year of the implementation of the subject rule, amendment or rescission. If the Staff investigation shows that the costs have not exceeded ten percent for all entities or, where appropriate, the estimated five hundred dollars, Staff's Memorandum shall be entered into EFIS under the rulemaking's docket number.

The Staff's response regarding the accuracy of the published cost estimates is within the time frame specified by Section 536.200.2, RSMo 2000. This statute requires publication in the *Missouri Register* of a report of any excess cost over estimated cost, or cost over five hundred dollars, where appropriate, within 90 days after the close of the "first full fiscal year" after the implementation of the subject rule, amendment or rescission. The change in the rule that was the subject of this case was effective on August 30, 2012. The first full fiscal year after implementation of the rules thus ended on June 30, 2014. Accordingly, September 28, 2014 would represent the 90-day expiration period for the publication of a report regarding excess cost information in the *Missouri Register*. Since the Staff's investigation indicates that the published cost estimates related to the changes in the rule have not been exceeded, no *Missouri Register* publication is required under Section 536.200.2, RSMo 2000.