

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

In the Matter of Staff’s Review of )  
Commission Rules 4 CSR 240-20.060 )  
(Cogeneration), 4 CSR 240-3.155 )  
(Filing Requirements for Electric Utility )  
Cogeneration Tariff Filings) and )  
4 CSR 240-20.065 (Net Metering) )

**File No. EW-2018-0078**

In the Matter of a Working Case )  
to Explore Emerging Issues in )  
Utility Regulation )

**File No. EW-2017-0245**

**MOTION FOR RESPONSES REGARDING STANDARD OFFER CONTRACTS**

**COMES NOW** the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through counsel, and states the following:

1. On April 5, 2018, in File No. EW-2017-0245, Staff submitted its *Report on Distributed Energy Resources* (“Staff Report”) summarizing the information received from stakeholders responding to a series of Commission questions, and provided Staff’s analysis and recommendations.

2. Under Subsection VIII of the Staff Report, regarding the net metering and cogeneration rules, Staff summarized stakeholder comments regarding standard offer contracts (“SOC”) for various system sizes. Staff recommended the Commission order each electric utility to file an evaluation of impacts, including distribution system impacts, of raising the SOC size to 1 MW, 2.5 MW, and 5 MW, to further discuss the topic.

3. On April 18, 2018, the Commission issued its *Response to Staff Report Regarding Distributed Energy Resources* (“Response”) in File No. EW-2017-0245. In

its Response, the Commission accepted the recommendations offered by Staff in the April 5, 2018, Staff Report.

4. Therefore, in furtherance of the Commission's April 18, 2018, *Response* Staff respectfully requests that the Commission direct that each electric utility file an evaluation of the impacts, including distribution system impacts, of the SOC size being raised to 1 MW, 2.5 MW, and 5 MW by August 24, 2018 in File No. EW-2018-0078.

**WHEREFORE**, Staff requests the Commission order each electric utility to file the evaluation identified herein in File No. EW-2018-0078 by August 24, 2018; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

**/s/ Nicole Mers**

Nicole Mers  
Deputy 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](mailto:Nicole.mers@psc.mo.gov)

### **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 24<sup>th</sup> day of July, 2018.

**/s/ Nicole Mers**