

**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)** Integrated )  
Resource Planning Standard as Required by ) **File No. EW-2009-0290**  
Section 532 of the Energy Independence and )  
Security Act of 2007. )

In the Matter of the Consideration of Adoption )  
of the PURPA **Section 111(d)(17)** Rate Design )  
Modifications to Promote Energy Efficiency ) **File No. EW-2009-0291**  
Investments Standard as Required by Section )  
532 of the Energy Independence and Security )  
Act of 2007. )

In the Matter of the Consideration of Adoption )  
of the PURPA **Section 111(d)(18)** Consideration )  
of Smart Grid Investments Standard and PURPA ) **File No. EW-2009-0292**  
**Section 111(d)(19)** Smart Grid Information )  
Standard as Required by Section 1307 of the )  
Energy Independence and Security Act of 2007. )

**STAFF’S MATRIX FOR PURPA SECTION 111(d)(16)-(19) STANDARDS**

Comes now the Staff of the Missouri Public Service Commission (“Staff”) through the Office of the Staff Counsel of the Missouri Public Service Commission (“Commission”) and files its matrix relating to 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”), and the requirement of PURPA that the Commission consider and determine whether to adopt said standards. In support thereof, the Staff states as follows:

1. At the November 12, 2009 Agenda Session, Ms. Lena Mantle, Utility Regulatory Manager of the Energy Department of the Missouri Public Service Commission indicated to the Commissioners that (i) the Staff would provide a display of the various components of each of

the four new PURPA Section 111(d) standards established by EISA, (ii) the Staff would indicate where it believes the Commission has taken prior action regarding each of the components of the four new PURPA standards, and (iii) if the Staff does believe that the Commission has not taken prior action regarding the component, the Staff would indicate the manner in which the Staff suggests the Commission should take action on the standard. This matrix also shows which standards are being readdressed as part of the Staff's proposed revision of the 4 CSR 240-22.010-.080 (Chapter 22) Electric Utility Resource Planning rules and which standards are addressed through the Missouri Energy Efficiency Investment Act (Section 393.1124 RSMo.), commonly referred to as Senate Bill 376.

2. Given the status and nature of these proceedings, the Staff would note that the Commissioners are aware that the document *Reference Manual and Procedures for Implementation of the "PURPA Standards" in the Energy Independence and Security Act of 2007 (Reference Manual)*, August 11, 2008, sponsored by American Public Power Association (APPA), Edison Electric Institute (EEI), National Association of Regulatory Utility Commissioners (NARUC), and National Rural Electric Cooperative Association (NRECA), appears at:

<<http://www.naruc.org/Publications/EISAStandardsManualFINAL.pdf>>

and that a March 17, 2009 short Addendum to the *Reference Manual* appears at:

<[http://www.naruc.org/Publications/ARRAcorrectionstoPURPAandnote\\_v3.0.pdf](http://www.naruc.org/Publications/ARRAcorrectionstoPURPAandnote_v3.0.pdf)>

3. The Staff in its filing on November 12, 2009 noted the Commission's 1992 rulemaking respecting 4 CSR 240-32.100 Provision Of Basic Local And Interexchange Telecommunications Service. Attached to this filing is a copy of the January 16, 1992 *Missouri*

*Register* Proposed Rule and the July 17, 1992 *Missouri Register* Order of Rulemaking respecting 4 CSR 240-32.100.

Wherefore the Staff files the attached matrix of PURPA Section 111(d)(16)-(19) standards, as established by EISA Sections 532 and 1307, and Staff's position respecting the Commission's consideration of and determination regarding these standards.

Respectfully submitted,

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### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record and individuals and entities on the Staff's electronic mail list of interested individuals and entities this 20th day of November 2009.

/s/ Steven Dottheim