

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of a Working Case to)
Consider Mechanisms to Encourage) **File No. EW-2016-0041**
Infrastructure Efficiency)

MISSOURI DIVISION OF ENERGY'S RESPONSE TO REQUEST FOR PARTY SUBMISSIONS

COMES NOW, the Missouri Division of Energy ("DE"), by and through the undersigned counsel, and for its *Response to Request for Party Submission*, states:

1. On November 13, 2015, the Commission held a workshop to discuss pertinent issues related to Case File No. EW-2016-0041.
2. On November 18, 2015, Staff requested participating investor owned electric utilities and interested parties to respond no later than November 30, 2015, to the discussion points identified by Chairman Hall regarding (1) bifurcated line extension tariffs between service provided in areas with preexisting excess capacity and areas requiring additional infrastructure development, and (2) providing incentives, without utility discretion and based on customer eligibility criteria, comparable to those in existing Urban Core Development and Economic Redevelopment Riders to new customers entering applicable designated area.
3. DE does not oppose the consideration of a special tariff regarding bifurcating line extension tariffs between service provided in areas with preexisting excess capacity and areas requiring additional infrastructure development. However, DE believes that the criteria that define (1) areas with preexisting excess capacity, and (2) areas requiring additional infrastructure development must be researched and established by the Commission.

4. DE does not take a position at this time on the merits of providing incentives, without utility discretion and based on customer eligibility criteria, comparable to those in existing Urban Core Development and Economic Redevelopment Riders to new customers entering applicable designated area, but believes further research on the impacts of such incentives is required.
5. DE is generally supportive of expanding utility incentives to commercial and industrial customers to locate or expand their electric service in Missouri. However, the Commission should be mindful of each utility's unique service territory characteristics when aligning financial incentives with economic development opportunities and infrastructure utilization and the incentive's impact on a utility's other customers.
6. DE anticipates and looks forward to providing additional comments in response to Staff's report to be filed on December 11, 2015.

WHEREFORE, DE respectfully files its *Response to Request for Party Submission*.

Respectfully submitted,

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