

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

In the Matter of Staff's Review of Rules)
4 CSR 240-20.060, 4 CSR 240-3.155, and) File No. EW-2018-0078
4 CSR 240-20.065)

EMPIRE'S COMMENTS

COMES NOW The Empire District Electric Company ("Empire") and respectfully submits these Comments regarding 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).

1. Empire appreciates the opportunity to be involved in this working docket and to discuss possible changes to the cogeneration and net metering rules in an informal setting and before the Commission begins the formal rulemaking process.
2. Attached hereto are Empire's comments regarding Staff's proposed changes, as set forth in the attachments to Staff's Notice of Draft Rule for Comment filed herein on May 22, 2018.

WHEREFORE, The Empire District Electric Company submits these Comments and requests such relief as is just and proper under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document was filed in EFIS on this 15th day of June, 2018, with notice of the same being sent to all counsel of record.

Diana C. Carter

4 CSR 240-20.060 Cogeneration

Liberty Utilities recommends that the capacity should be related to the qualified capacity of the facility based on the SPP or MISO rules as appropriate. Specific costs which can be recovered in the fixed or variable portions should be specified. We recommend that the capacity rule should not be related specifically to load as the avoided capacity benefit will be based on the SPP rule more than coincident peak. We would also recommend that if the utility will be required to give credit for dispersed small systems, we should have some influence on where the systems will be located. In regards to the avoided costs, Liberty Utilities recommends that the energy should be the SPP market price in all events.

In reference to the phrasing of rule 11.C.1.A, Liberty Utilities would like to recommend the following suggestion: "Information characterizing the location (According to Global Information System (GIS) coordinates on the distribution circuits where systems are connected."

4 CSR 240-20.065 Net Metering:

One concern that Liberty Utilities would like more information is regards to the Time of Use rates. If a utility moves TOU rates or has energy & demand or splits the bill into transmission, distribution, and energy charges, would every customer have to move to the then current net metering rules or would a grandfather clause be put into place at the time their system was installed?

Liberty Utilities joins in the comments filed by Ameren Missouri and KCP&L regarding the proposed Cogeneration and Net Metering rule changes.