

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

MAY 7 2009

Missouri Public
Service Commission

In the Matter of a Proposed Rulemaking
To Amend Commission Rule 4 CRS 240-20.065

Case No. EX-2009-0267

COMMENTS OF MISSOURI VALLEY RENEWABLE ENERGY, LLC

I would like to thank the Commission for removing the insurance obligation on customer-generator system under the size of 10 KW.

I also would like to object to the language that is still the rule discouraging customer-generators from installing a Photovoltaic system.

When the Easy Connections Act was written and adopted into law, it was for the purpose of removing the barriers that were in place to discourage small business and homeowners from installing a Photovoltaic system on their building.

I can understand the utilities concern for safety when it comes to the workers that must work on the power lines during a power outage. This is not something to be taken lightly.

All inverters that are sold and installed in the United States have to meet strict guidelines under UL-1741. These regulations are designed for the safety of the worker that may come in contact with a customer-generator system. As you know there have been no cases of an inverter back feeding power to the grid during an outage.

The true purpose of the systems is not to compete with the utilities but rather to assist them in times of peak load demand. Most utilities have programs in place to reduce the consumption of power by customer during high use times through voluntary and intermittent power interruptions. The installation of a grid connected system just helps reduce the need for more power on a specific dwelling during these times that generally occur in the summer months when use is at its peak and reduce the load on the power transmission lines.

Photovoltaic will never be a substitute for baseline power generation nor a source of baseline generation due to the production being during daylight hours but it can be used and is being used around the world to reduce peak load demand.

The aging transmission grid is in need of repair or replacement and the continue demand for more electricity is taxing it as demand continues to grow. The existing technology of Photovoltaic can be used to produce power in a very short period of time without

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Reporter Pat Stewart

investment by the utilities but rather by the investments of small business owner and homeowners.

Thus the utilities should embrace the use of Photovoltaic rather than seeing it as competing with their revenue stream.

I would encourage the Commission to remove any language that would serve as a deterrent to small business owners and homeowners installing a Photovoltaic system on their building or on their premises by suggesting that there is an implied risk of installing Photovoltaic on the property when we know that it does not.

In a recent ballot initiative that was passed into law last year by a vast majority of the citizens of Missouri, the desire of the public to participate in the future of energy production on their own property is obvious. It would be an injustice to allow language to remain in the rule that discourages a person or taking advantage of their rights as passed by law.

Thank you for allowing me comment on this matter of great importance to the future of Missouri and the future of economic development in the state.

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