**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of a Working Case to Review )

The Commission’s Missouri Energy )

Efficiency Investment Act (MEEIA) Rules ) File No. EW-2015-0105

4 CSR 240-3.163, 4 CSR 240-3.164, )

4 CSR 240-20.093, and 4 CSR 240-20.094. )

**MISSOURI DIVISION OF ENERGY’S COMMENTS**

**IN RESPONSE TO ISSUES RELATED TO THE RULEMAKING WORKSHOP**

COMES NOW the Missouri Department of Economic Development – Division of Energy (“DE”)[[1]](#footnote-1) and submits the following comments and attached revisions, regarding the Commission’s rules implementing the Missouri Energy Efficiency Act[[2]](#footnote-2).

* Quantification of energy savings by opt-out customers (all classes): The Commission should develop a tracking database. Opt-out (5,000 kW or greater) should have the option to submit records of savings to the Commission’s tracking database. Opt-out (between 2,500 and 5,000 kW) records of savings should be periodically submitted to Staff and should be tracked in the Commission’s tracking database. Municipal providers, rural cooperative providers, interconnected and self-generators have the option to submit records of savings to the Commission’s tracking database.
* Decoupling: DE agrees that AW-2015-0282 is the more appropriate forum to address decoupling.
* Striking or revising goals for demand and energy savings: The existing goals are reasonable and should be retained.

In addition to DE’s responses on the above unresolved issues, DE wishes to provide comments on the new “MEEIA alternative case procedure” which Staff included with its redline revisions. DE requests additional clarification on the need for this alternative process. Upon initial review of the proposal, DE instead prefers to maintain the flexibility allowed under the current rules.

Please also see DE’s proposed comments and edits in the attached rule redlines. DE appreciates the opportunity to participate in the workshop process and provide comments.

Respectfully submitted,

*/s/ Alexander Antal*

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1. Effective August 29, 2013, Executive Order 13-03 transferred “all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development . . . .” [↑](#footnote-ref-1)
2. § 393.1075 RSMo. [↑](#footnote-ref-2)