EX-2027-0060
Stakeholder Comments and Staff Responses

Summary of OPC comments and Staff Response			
Rule Reference	**Recommended Change**	**Summary of Comment**	**Staff Response**
Purpose of Rule 20 CSR 4240-20.030	PURPOSE: This rule … Requirements regarding the submission of depreciation studies, databases and property unit catalogs are found at [4 CSR 240-3.160 and 4 CSR 240-3.175] **20 CSR 4240-~~10.200~~ 3.175**.	References 20 CSR 4240-10.200, however, that rule does not exist in the current version of the Commission's Chapter 10 rules.	Staff notes that the reference made to 20 CSR 4240-10.200 is to a rule under development. Staff agrees with OPC in part but recommends the Commission update as follows: [4 CSR 240-3.160 and 4 CSR 240-3.175] **20 CSR 4240-3.160 and 20 CSR 4240-3.175**
20 CSR 4240-20.030(3)	(3) Regarding plant acquired or placed in service after [1993] **~~2026~~**, when implementing section (1), each electrical corporation subject to the commission's jurisdiction shall—	With this rulemaking, the Commission proposes to change the date in this section from 1993 to 2026. OPC argues "doing so would vastly change how electrical corporations are required to keep their plant records, as much of the electrical corporations' plant was acquired or placed in service before 2026."	Staff does not share OPC's concern. Further, section (4) specifically states "This rule shall not be construed as waiving any recordkeeping requirement in effect prior to [1994] **2026**."

20 CSR 4240-20.065 (Interconnection Application/Agreement)[1]	Portions of Interconnection Application/Agreement titled: • For Customers Who Are Installing Solar Systems • Ownership of Renewable Energy Credits or Renewable Energy Certificates (RECs) • Solar Rebate (For Solar Installations only) • Solar Rebate Declaration (For Solar Installations only)	To avoid customer confusion, OPC suggests that in addition to deleting the provisions that identify the amount of the solar rebate for each time period (of which all have expired), the Commission should also delete all references to the solar rebates throughout the Application as it appears in the rule.	Staff disagrees with OPC's comment. 393.1030.4 states "Nothing in this section shall prevent an electrical corporation from offering rebates after July 1, 2020, through an approved tariff." Thus, maintaining minimum standards for solar rebates/customer solar installations in the application is necessary in the event a utility chooses to offer solar rebates in the future. One of the utility stakeholders specifically requested the portion of the application entitled "Solar Rebate (For Solar Installations only)" remain as a part of the application. Additionally, 20.100(4) allows utilities to purchase S-RECs from customers through a standard offer contract and certain information that OPC proposes to remove provide assurance that the installation meets certain expectations. Edits to 20.065 and 20.100 related to solar rebates were made in tandem so if the Commission agrees with OPC, additional edits in the 20.100 draft may be warranted.

[1] Staff notes an error on pages 1262-1263 of the Missouri Register, Vol. 51, No. 19. On the Interconnection Application/ Agreement under the title "H. Solar Rebate (For Solar Installations only)", strike the language after "Completed Taxpayer Information Form" beginning with "location where a…." to the heading titled "I. Solar Rebate Declaration (For Solar Installations only)".

20 CSR 4240-20.070	PURPOSE: This rule is promulgated .... ~~**Additional requirements pertaining to this subject matter are also found at [4 CSR 240-3.185] 20 CSR 4240-3.185.**~~	OPC recommends deleting the last sentence of the purpose that references 20 CSR 4240-3.185.	Staff agrees.
20 CSR 4240-20.091(1)(C).1	1. Environmental costs do not include fuel and purchased power costs as defined in [4 CSR 240-20.090(1)(B)] 20 CSR 4240-20.090(1)(~~B~~)**L**.	OPC notes the definition of fuel and purchase power costs is at 20 CSR 4240-20.090(1)(L). The proposed draft points to the definition of actual net energy costs at 20 CSR 4240-20.090(1)(B).	Staff agrees.
20 CSR 4240-20.092(1)(X)	(X) Energy savings target means the energy savings level approved by the commission under [4 CSR 240-20.094(4)(I) or 4 CSR 240-20.094(5)(A)6] 20 CSR 4240- 20.094(4)(I) or 20 CSR 4240-20.094(5)(A)~~6~~**5**. Energy savings targets are the baseline for determining the utility's demand-side portfolio's energy savings performance levels for the earnings opportunity component of a DSIM;	"The OPC believes that this should instead be a reference to 20 CSR 4240-20.094(5)(A)5, which references a Commission order on an application for approval of modifications to demand-side programs. Updating this reference to subsection 5 as opposed to subsection 6 also mirrors the proposed change in 20 CSR 4240-20.092(1)(O)."	Staff agrees.

20 CSR 4240-20.093(15)(C)	(C) A person or entity not a party to the utility's filing for demand-side program approval in which a DSIM is approved by the commission may timely apply to the commission for intervention, pursuant to [4 CSR 240-2.075(2) through (4)] 20 CSR 4240- 2.075~~**(2) through (4) of the commission's rule on intervention, respecting any related subsequent periodic rate adjustment proceeding or, pursuant to [4 CSR 240-2.075(1) through (5)] 20 CSR 4240-2.075(1) through (5), respecting any subsequent utility's filing for demand-side program approval to modify, continue, or discontinue the same DSIM**~~.	"The OPC suggests simplifying this subsection of 20 CSR 4240-20.093 by including only a reference to the general intervention rule itself and removing the distinction between the types of cases."	Staff agrees.