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Missouri Energy Development Association

Missouri Public Service Commission

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September 5, 2008

Ameren

Aquila

Atmos Energy Corporation

Empire District Electric Company

Great Plains Energy (KC Power & Light)

The Laclede Group, Inc.

Missouri American Water

Missouri Gas Energy

Colleen M. Dale  
Secretary of the Commission  
Missouri Public Service Commission  
PO Box 360  
Jefferson City, MO 65102

**RE: EX-2008-0280 Rulemaking Comments**

Dear Judge Dale:

The Missouri Energy Development Association (MEDA) does not have any suggested changes to proposed rule 4 CSR 240-20.065. MEDA does however request that the Commission provide guidance on the following interpretation of this rule.

Section (1)(C)7 of the proposed rule defines customer generators as a device that: **Contains a mechanism that automatically disables the unit and interrupts the flow of electricity back onto the electric utility's electrical lines in the event that service to the customer-generator is interrupted.**" (emphasis added)

I am interpreting this section as requiring that the unit be "disabled" only to the extent of interrupting power flow from the customer's equipment -to the power lines in the event of a power outage or unacceptable service conditions. I am not interpreting this as a requirement that customers' back-up sources of power during power outages ~~must~~ be turned off until power is restored. The latter interpretation would clearly be an absurd reading of the statute in that it would frustrate the very purpose for which customers install back-up generation in the first place. Furthermore, interpreting this language as a requirement to turn off back-up power sources would be in clear conflict with the last sentence of Section C of the contract in the proposed rule where it refers to a parallel blocking scheme being permissible.

If you have any questions, please do not hesitate to call me at (573) 634-8678 or by e-mail at Warren@missourienergy.org.

Sincerely,

Warren T. Wood  
President