

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

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(11) Net Metering)	
Standard as Required by Section 1251 of the)	Case No. EO-2006-0493
Energy Policy Act of 2005)	

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(14) Time-Based)	
Metering and Communications Standard as)	Case No. EO-2006-0496
Required by Section 1251 of the Energy Policy)	
Act of 2005)	

In the Matter of the Consideration of Adoption)	
of the PURPA Section 111(d)(15) Interconnection)	
Standard as Required by Section 1251 of the)	Case No. EO-2006-0497
Energy Policy Act of 2005)	

**POSITION STATEMENTS OF EXPERT APPEARING ON
BEHALF OF THE EMPIRE DISTRICT ELECTRIC COMPANY**

In accordance with the "Order Establishing a Procedural Schedule for On-the-Record Presentations" issued on March 15, 2007, by the Missouri Public Service Commission, The Empire District Electric Company ("Empire"), hereby files the attached written position statements of David W. Gibson, who will appear on Empire's behalf at the on-the-record presentations scheduled for April 25, 2007, in the above-captioned dockets.

Respectfully submitted,

_____/s/_____
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ATTORNEYS FOR THE EMPIRE DISTRICT
ELECTRIC COMPANY

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

In the Matter of the Consideration of Adoption)
of the PURPA Section 111(d)(11) Net Metering)
Standard as Required by Section 1251 of the)
Energy Policy Act of 2005)

Case No. EO-2006-0493

**POSITION STATEMENT OF DAVID W. GIBSON
ON BEHALF OF THE EMPIRE DISTRICT ELECTRIC COMPANY**

1 IF IT PLEASE THE COMMISSION:

2 The purpose of the EAct 2005 ("EAct") Standard for net metering was
3 designed to achieve the result of giving a customer-generator the ability to offset power
4 that they use with any power that they may supply to the utility.

5 The current net metering standard that is used in Missouri by Empire has 4
6 customers which currently receive and generate energy on the system and their kWh
7 usage is offset by any generation that they provide to Empire on a monthly basis, which
8 is exactly what is mandated in the EAct Standard. Whether the customer-generator's
9 usage or generation is to be recorded via a single meter or multiple meters is not part of
10 the EAct Standard and is irrelevant to include this requirement as has been suggested
11 by some parties. Issues related to any additional costs which may be incurred by using
12 a single meter have not been addressed and are beyond the scope of the EAct
13 Standard. As such, this should not be an issue since the purpose of the EAct
14 Standard is being met.

15 Pricing of the energy supplied by the customer-generator is determined using
16 Commission approved tariffs. Some parties have suggested that the pricing should be

1 the same as the tariff that is used to price their usage. Issues related to using the same
2 tariffs both for usage and generation or other pricing mechanisms have not been
3 addressed in this proceeding and are beyond the scope of the EAct Standard. As a
4 matter of fact, one of the goals of PURPA is for equitable retail rates for electric
5 customers and by using the single tariff for both usage and generation, the customers
6 who do not generate part of their usage are subsidizing the customer generators due to
7 the compensating of costs that the customer-generator does not offset such as
8 transmission costs, meter reading etc.

9 It should be pointed out that the Kansas Corporation Commission decided that
10 they were in compliance with the EAct Standard even though their current requirement
11 has a limitation on participation, does not specify number of meters and does not
12 specify that the same rate for usage and generation be used.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 13TH day of April, 2007:

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