

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

In the Matter of a Working Case)
to Explore Emerging Issues) **File No. EW-2017-0245**
in Utility Regulation)

**RENEW MISSOURI’S COMMENTS ON STAFF’S
DISTRIBUTED ENERGY RESOURCE DRAFT RULE**

COMES NOW Renew Missouri Advocates (“Renew Missouri”), and in response to the Missouri Public Service Commission (“Commission”) Staff’s request for comments on its draft rule, states:

1. Renew Missouri continues to support the Commission’s initiative in establishing this Working Case and in raising issues particular to distributed energy resources (“DER”). In previously filed comments,¹ Renew Missouri explained the importance of adopting a regulatory approach to the expanding universe of DER set on finding ways to support the deployment and operation of DER as a cost-effective alternative to traditional utility-scale generation, transmission, and distribution technologies. This shift requires development of evaluation and analysis tools and capabilities such as improved planning techniques, more robust benefit-cost analysis frameworks, and platforms for technological experimentation, demonstration, and piloting. Supporting the deployment and wise use of DER will advance and enhance the public interest inherent in electrical rates and services in Missouri. To that end, Renew Missouri supports the direction of the June 25th draft rule incorporating DER analysis into the Commission’s chapter 22 Electric Utility Resource Planning Rules.

2. The draft rules provide a framework for the utilities and their customers to chart information on DER in a way that will encourage adoption of cost effective resources by utilities,

¹ See Doc. No. 46, *Renew Missouri's Comments on Distributed Energy Resources*.

customers, and aggregators and/or competitive third-party service providers. However, two additional “building blocks” should be included to improve this rule:

- Marginal emissions rates studies – Quantitative evaluation and characterization of the marginal emissions impacts of DER operations, so as to understand the environmental benefits or costs of those operations, and;
- Customer data acquisition and sharing issues – Rules and technologies for increasing the availability and dissemination of customer data.

3. Renew Missouri proposes to include additional provisions to meet these objectives. First, section (2)(C) is a positive step towards increasing the availability and dissemination of information that will enable and encourage customers to adopt cost-effective and beneficial DER by making the information in the Distributed Generator and Energy Storage Database section publicly available. To improve the draft rule the information on DER Adoption Potential (in section (3)) and plans for integrating DERs into the distribution system (in section (4)) should also be available to members of the public. Making this information available either publicly or upon request will facilitate greater DER penetration by giving customers, the utilities, and third-party market participants the information necessary to realize the grid benefits of DER. Three new provisions should be added as follows:

- Under section (3), an additional sentence stating: “**Information and analysis under this section shall be made available upon request to any party.**”
- Under section (4), an additional provision stating: “**(4)(G) The information and analysis prepared to comply with this section shall be made available upon request to any party.**”

- Under section (2)(A), an additional provision stating: “**5. Summaries of the utility’s DER Adoption potential studies performed to comply with section (3) and the DER planning process evaluation under section (4); and**”

4. Second, under the Distributed Generator and Energy Storage Database section under (2)(A) a new line should be added as follows:

- “**(2)(A)6. Quantitative evaluation of the marginal emissions impacts of DER resources connected to the utility’s grid.**”

Renew Missouri supports DER as a way to cost effectively and efficiently operate the grid that can permit individual customers to manage and reduce their electric bills and household energy burdens as well as contribute to a resilient and less expensive grid for all customers. In addition to those benefits, DER can help reduce the societal impacts of electricity generation and use. A quantitative evaluation that is included in the publicly available database will help customers and utilities evaluate the impact of DER and may provide additional incentive to encourage adoption of these resources.

5. In addition to changing how utilities manage and plan for resource development and grid management, DERs will transform the ways in which customers interact with electricity service providers and the grid. Because of the opportunities presented by DERs for customers and third-party market participants to contribute to a stable and less expensive grid for all customers the information created for complying with these new rules should be made available to the public and parties upon request as proposed by Renew Missouri above.

WHEREFORE, Renew Missouri respectfully submits its *Comments*.

Respectfully Submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 16th day of July 2018:

/s/ Tim Opitz
