

**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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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)(14) Time-Based)
Metering and Communications Standard as)
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Act of 2005

Case No. EO-2006-0496

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

1 The purpose of the EPAct Standard for time-based metering and communication
2 was designed to provide the increased conservation of energy through demand-side
3 resource options.

4 The descriptions of time-based rate schedules that may be offered in the EPAct
5 Standard are described as; ...shifting usage to a lower cost period or reducing their
6 consumption overall..., ...reducing peak period energy consumption..., and ...peak load
7 reduction agreements that reduce a utility's planned capacity obligations (14)(B). Since
8 Empire has a time-based tariff (Optional Time of Use Adjustment, Rider OTOU) which
9 has been approved by the Missouri Public Service Commission, it appears that the EPAct
10 requirement is met.

11 The current standard is addressed in 4 CSR 240-22.

12 One area of disagreement is that even though utilities have seasonal tariffed rates,
13 that this does not meet the ability to "manage energy and cost through advanced metering
14 and communication technology". This ignores Rider OTOU, mentioned above, which
15 has an adjustment for on-peak, shoulder and off-peak usage and thus does enable a
16 customer to manage energy and cost. This tariff appears to satisfy the shortcomings of

1 only having seasonal rates. In addition, AmerenUE, KCPL and Aquila all have time of
2 use/time of day rates.

3 A question was raised about the requirement to conduct an investigation and issue
4 a decision whether or not it is appropriate for electric utilities to provide and install time-
5 based meters and communication devices. It does not make economic sense to install
6 such meters before they are needed. Since this type of meter is more expensive than
7 regular meters, there would be additional cost to the customers without any benefit if
8 only a few customers were using the program.

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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