**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

In the Matter of Ameren Missouri's )

Application for Authorization to Suspend ) File No. ET-2014-0085

Payment of Certain Solar Rebates. ) Tariff No. YE-2014-0173

**Missouri Division of Energy Position Statement**

COMES NOW the Missouri Department of Economic Development – Division of Energy (“MDE”) and states the following as its position. For issues on which MDE states no position below, MDE reserves the right to fully participate in these proceedings as to all relevant issues, including briefing any and all issues.

1. **List of Issues**

1. Is accurate and reliable information available to perform the 1% retail rate impact calculation under any of the methods proposed in this case? If not, should the Commission deny Ameren Missouri’s application in this case?

**If the Commission finds that the questions raised by the parties regarding the RRI calculation related to the process, and data/inputs of the untested model being used for the first time in this round of compliance filings are sufficient to put the reliability of the 1% calculation in question, then the Commission should not grant Ameren’s application. MDE’s position is that discontinuation of solar rebates will have a significant negative impact on the solar industry and on Ameren customers who have invested in solar energy installations in anticipation of a solar rebate. Suspension of rebates, therefore, may not be appropriate in light of the uncertainty surrounding the calculation.**

 3. In utilizing the method of calculating the 1% retail rate cap that the Commission determines is appropriate:

e. Must an electric utility’s most current adopted preferred resource plan be used for determining the renewable energy resource additions to the RES-compliant portfolio when completing the retail rate impact calculation under Rule 4 CSR 240-20.100 (5)(B).

**The rule states that the RES compliant portfolio “will utilize the most recent electric utility resource planning analysis.” MDE points out the significant uncertainty associated with the long-term IRP process, and the utility’s ability to change its IRP with a 60-day filing “if the utility determines that the preferred resource plan or acquisition strategy is no longer appropriate.” RRI calculations based on the IRP, therefore, may not adequately consider the market realities or implications of the calculation.**

7. Should the Commission authorize Ameren Missouri to stop making solar rebate payments beginning no earlier than December 10, 2013, in order to comply with Section 393.1030.2 (1) and .3 RSMo (Supp. 2013) and Rule 4 CSR 240-20.100 (5)?

**If the Commission finds that there is sufficient uncertainty surrounding the calculation, the Commission should not permit solar rebates to be discontinued. Instead, the HB 142 rulemaking workshop docket Case No. EW-2014-0092 would be the appropriate forum for resolution of issues regarding the RRI calculation.**

 Respectfully submitted,

 **CHRIS KOSTER**

*/s/ Jeremy Knee*

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been emailed to parties of record this 6th day of November 2013.

 */s/ Jeremy Knee*