



April 22, 2009

Re: APX Comments to the Missouri Public Services Commission (PSC) regarding Rev 7 of its draft rules for a State Electric Utility Renewable Energy Standard

APX Inc. thanks the Missouri PSC for the opportunity to submit comments on Rev 7 of its draft Electric Utility Renewable Energy Standard (RES) rules.

APX strongly supports the State of Missouri's effort to implement an RES, including the recognition of tradable Renewable Energy Certificates (RECs). As background, APX is the leading infrastructure provider for environmental and energy markets and is the system of choice for tracking RECs in every major US renewable energy system, including:

- ERCOT Renewable Energy Credit Trading System
- NEPOOL Generation Information System (GIS)
- PJM-Generation Attributes Tracking System (GATS)
- Western Renewable Energy Generation Information System (WREGIS)
- Midwest Renewable Energy Tracking System (MRETS)

APX also will be launching a national REC registry June 1, 2009 called the North American Renewables Registry (NAR). NAR is designed for both the national voluntary REC market and for state compliance markets that are not part of an existing regional REC trading system. NAR will provide an additional option for States and their participating stakeholders and is an easy-to-use, web-based platform to support the creation, tracking, management and retirement of RECs. It is designed to track RECs that were created on or after July 1, 2007.

Given our experience in the State RPS/RES markets, we strongly believe that tracking system architecture is one of the key elements to ensure an efficient, transparent, trustworthy market.

Deliverability: While APX does not have an official position regarding what deliverability rules Missouri should adopt, we have worked with several states to enable REC tracking systems to match up the delivery of RECs with power deliveries through NERC tags and/or power schedules. We intend to provide such functionality for states using NAR when such functionality is necessary for a state.

Kari Decker
Managing Director
APX, Inc.
kdecker@apx.com

Lars Kvale
Product Manager, Renewable Energy Registries
APX, Inc.
lkvale@apx.com