November 22, 2010

Re: MOSEIA Renewable Energy Standard Workshop, EW-2011-0031, Proposal

MOSEIA believes that the rules developed by the Missouri Public Service Commission for the Proposition C requirements of geographical sourcing of Solar Renewable Energy Certificates and the 1% rate cap can be fully implemented. In addition, the “sold to” provision should remain intact.

Based on Proposition C Renewable Energy Standard compliance requirements for 2011, we believe the market for Solar PV in Missouri to be sized at 15.5 MW and valued at $100,000,000. This represents the installation of 620 – 25 KW Grid Tied Systems by the 25 Member MOSEIA member companies (25 systems per company) who employee more than 130 Missourians. The solar industry install capability does not include the state’s numerous electrical contractors who are also engaging in installing solar and creating jobs for Missourians.

To enable the compliance with Proposition C under the PSC rules, from 2011 – 2014, we offer the following Solar PV compliance plan using the following assumptions:

- Prop C Solar PV total compliance for 2011 is 15.5 MW, which is based on estimates provided by Ameren
- Value of Missouri SREC at $200
- The Missouri solar industry will install 15.5MW of PV systems eligible for the $2/watt rebate

Year	2011	2012	2013
Prop C Yearly Solar Total (MW) Compliance Requirements	15.5MW	15.5MW	15.5MW
Prop C $2.00 a watt rebate value in Millions	$31,000,000	$31,000,000	$31,000,000
SREC Value at $200. 19,607,500 kwh	$3,920,500	$3,920,500	$3,920,500
Total Cost of Compliance	$34,920,500	$34,920,500	$34,920,500

MOSEIA’s Solar PV compliance plan offers the following benefits:

1. Validates MOSEIA’s position that the solar industry has the installation and work force to enable utilities to reach each year’s compliance goal.
2. Clearly, the utilities can comply while staying under their proposed 1% rate cap of $39,000,000 (based on Ameren ($24million) and KCPL ($15million) estimates).
3. Solar PV compliance plan provides certainty for utilities, Missouri customers and the solar industry.
4. For each Solar PV kilowatt-hour generated, utilities receive the value of 1.25 kilowatt-hours for purposes of compliance – maximizing the installed capacity to meet compliance.
5. Will not exceed 1% cap, and is actually below the required cost cap, which is equitable.
6. Enables economic development in Missouri, thus avoiding sending Missouri customer dollars out of state. Reference Vote Solar JEDI Analysis File EW-2011-0031.
7. Support’s Commissioner Kenny’s goals of increasing deployment of renewable energy; expanding economic development and protecting energy consumers.