

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Consideration of Adoption )	
Of the PURPA Section 111(d)(15) Interconnection )	Case No. EO-2006-0497
Standard as Required by Section 1251 of the )	
Energy Policy Act of 2005 )	

**POSITION STATEMENT OF P. J. WILSON ON BEHALF OF CONCERNED  
CITIZENS  
OF PLATTE COUNTY, SIERRA CLUB, OZARK ENERGY SERVICES, MID-  
MISSOURI PEACEWORKS AND HEARTLAND RENEWABLE ENERGY SOCIETY**

Comes now P. J. Wilson and in response to the Commission's March 15 "Order Establishing a Procedural Schedule for On-the-Record Presentations" state my position on "prior state action" as follows:

The only relevant prior state actions are the Consumer Clean Energy Act, § 386.887.9, RSMo (2002) and the implementing regulation 4 CSR 240-20.065(6), which authorize interconnection for "net metering," and 4 CSR 240-20.060, which covers only interconnection for cogeneration. The PURPA standard requires utilities to offer interconnection to "any electric consumer." Because of their limited applicability, the Missouri standards are not the same or comparable.

The PURPA standard says that interconnection "shall be offered based upon" IEEE Standard 1547. § 386.887.7 mentions IEEE among other standard-setting agencies but is not based on IEEE 1547 to the exclusion of other standards. The cogeneration regulation does not mention standards at all. In its current form IEEE 1547 is regarded as *the* standard for interconnection of small systems. Without it a state rule cannot be considered comparable to the PURPA standard.

The PURPA standard says: "agreements and procedures shall be established whereby the services offered shall promote current best practices of interconnection for distributed

generation, including but not limited to practices stipulated in model codes adopted by associations of state regulatory agencies.” The Missouri law and rules do not do this. This is such a prominent part of the federal standard that any state standard completely lacking such agreements or procedures cannot be considered the same or comparable.

Missouri has not acted on or otherwise considered the same or a comparable standard. Missouri offers interconnection in circumstances too limited to be considered comparable, and without conditions that are essential to the federal standard.

/s/ P. J. Wilson

#### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was sent by email on this 11th day of April, 2007, to the persons on the EFIS service list.

/s/Henry B. Robertson  
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