

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for Permission and)
Approval of a Certificate of Public Convenience and)
Necessity Authorizing it to Offer a Pilot Distributed)
Solar Program and File Associated Tariff.)
File No. EA-2016-0208

**STATEMENT OF POSITIONS OF
WALMART STORES, INC.**

In accordance with the Commission’s September 7, 2016, Fourth Order Amending Procedural Schedule, Walmart Stores Inc. (“Walmart”), hereby submits the following position statement. Walmart acknowledges that this position statement was due on October 12. Due to a family medical situation, undersigned counsel was unable to timely file this position statement. Nevertheless, Walmart asks that the Commission consider this document in its preparation for the hearing and deliberations in this case.

As indicated in its prefiled testimony, Walmart does not oppose the positions contained in the Non-Unanimous Stipulation and Agreement filed by various parties. That said, Walmart is concerned that the positions contained in that settlement not be viewed as a policy precedent for the rollout of future distributed solar facilities.

Walmart has established aggressive and significant renewable energy goals, including: (1) to be supplied 100 percent by renewable energy and (2) to drive, by 2020, the annual production or procurement of seven billion kWh of renewable energy across the globe. The Corporate Renewable Energy Buyer’s Principles, published by World Resources Institute and World Wildlife Fund and to which Walmart is a signatory, provides more detail around corporate customer renewable energy needs.

Given these corporate energy goals, Walmart is very interested in the successful widespread implementation of distributed solar in Missouri. Walmart is concerned that the provisions of the Non-Unanimous Stipulation, if used as a template for future distributed solar in Missouri, will not further these renewable energy goals. Specifically, the Non-Unanimous Stipulation fails to recognize the opportunity costs of the solar partners associated with granting the utility access to rooftops or other available space. In other states, these opportunity costs have been recognized through lease payments to the customers. Moreover, the Non-Unanimous Stipulation calls on solar partners to pay for all installation costs above \$2.20 / watt-DC.

While the solar partner provides access to the dedicated space for a period of 25 years, and pays for any installation costs above \$2.20 / watt-DC, the solar partner receives very little, if any, tangible benefits. Specifically, the partner receives no lease payments, does not receive any of the energy from the solar facility and does not claim any of the solar renewable energy credits.

Given these shortcomings, Walmart is concerned that the structure contained in the Non-Unanimous Stipulation will not lead to the ubiquitous roll out of distributed solar generation. Nevertheless, recognizing that this is a pilot program and Ameren's commitment to study the need for lease payments in the future, Walmart does not oppose the Non-Unanimous Stipulation. Walmart does ask that the Commission warn that the adoption of the structure contained in settlement not be viewed upon as a policy determination for the consideration of future distributed solar facilities.

Respectfully submitted,



David L. Woodsmall, MBE #40747
308 E. High Street, Suite 204
Jefferson City, Missouri 65101
(573) 636-6006 (telephone)
(573) 636-6007 (facsimile)
david.woodsmall@woodsmalllaw.com

ATTORNEY FOR WALMART STORES,
INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing pleading by email, facsimile or First Class United States Mail to all parties by their attorneys of record as provided by the Secretary of the Commission.



David L. Woodsmall

Dated: October 13, 2016