

**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 and a Certificate of Public Convenience and	)	<b>Docket No. EA-2016-0208</b>
Necessity Authorizing it to Offer a Pilot Distributed	)	
Solar Program and File Associated Tariff.	)	

**STATEMENT OF POSITION OF BRIGHTERGY, LLC**

COMES NOW Brightergy, LLC (“Brightergy”) and for its Statement of Position states the following:

1. Brightergy does not take a position on the question of whether to grant Ameren’s Application, and thus will not state specific positions regarding the contested issues as set out in the Joint Statement of Contested Issues, List of Witnesses, Order of Cross Examination, and Order of Opening Statements filed in this docket.
2. Instead, Brightergy states that any pricing approved by the Commission in this Docket does not accurately reflect the cost of constructing a solar photovoltaic generation facility, because a utility will be required to include costs which an independent installer would not have to pay.
3. A typical utility-owned distributed generation solar installation would require some type of payment to the facility owners who host the systems. Ameren does not plan on purchasing or leasing real estate for its program.
4. Brightergy’s position is that this program is designed for a unique purpose, and should not be a model for future distributed generation programs in the state.

Respectfully submitted,

/s/ Andrew Zellers

Andrew Zellers MO. Bar No. 57884

General Counsel and Vice President for Regulatory Affairs

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**Attorney for Brightergy, LLC**

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been served electronically this 12th day of October, 2016, to all parties on the Commission's service list in this case.

/s/ Andrew Zellers