BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

EARTH ISLAND INSTITUTE d/b/a/ RENEW MISSOURI, et. al.	)	
Complainants	)	
v.	)	**Case No. EC-2013-0377**
UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI,	)	
Respondent	)	
EARTH ISLAND INSTITUTE d/b/a/ RENEW MISSOURI, et. al.	)	
Complainants	)	
v.	)	**Case No. EC-2013-0378**
THE EMPIRE DISTRICT ELECTRIC COMPANY,	)	
Respondent	)	

STAFF'S RESPONSE TO DISPOSITIVE MOTIONS

COMES NOW Staff of the Missouri Public Service Commission ("Staff), by and through the undersigned counsel, and respectfully submits this *Staff Response* to the Missouri Public Service Commission ("Commission") stating the following:

Staff provides the analysis and recommendation herein in response to Earth Island Institute d/b/a Renew Missouri, et. al's ("Renew Missouri") *Motion For Summary Determination* and *Legal Memorandum In Support Of Motion For Summary Determination* filed July 23, 2013, Union Electric Company d/b/a Ameren Missouri's ("Ameren Missouri") *Motion To Dismiss*, and The Empire District Electric Company's

("Empire") *Motion To Dismiss Complaint*. The issues that are the subject of this response and that are before the Commission for decision require legal interpretation of the Renewable Energy Standard ("RES") Statute and rule, Section 393.1020 et. seq., and Rule 4 CSR 240-20.100, respectively. The Commission has jurisdiction to determine the meaning of the statutes the legislature has tasked them to administer, as well as the promulgated rules. Summary disposition of Renew Missouri's January 30, 2013 *Complaint* against Ameren Missouri and Empire would expeditiously resolve this dispute and provide the much needed guidance of the Commission on the interpretation of the RES statute and rule. The needed interpretations are legal, and not factual, in nature. Rule 4 CSR 240-2.117 (2) provides:

> Determination on the Pleadings—Except in a case seeking a rate increase or which is subject to an operation of law date, the commission may, on its own motion or on the motion of any party, dispose of all or any part of a case on the pleadings whenever such disposition is not otherwise contrary to law or contrary to the public interest.

The matters for the Commission's decision are: what resources qualify as hydropower; what Renewable Energy Credits ("RECs") qualify for use in meeting the RES; does the RES allow use of RECs unbundled from energy to meet the portfolio requirements; and whether Section 393.1050, RSMo is in irreconcilable conflict with the RES. Staff will respond to each of these items in turn.

<u>Qualifying Hydropower--Nameplating</u>

Section 393.1025 (5) defines "Renewable energy resources" to include "….hydropower…that does not require a new diversion or impoundment of water and that has a nameplate rating of ten megawatts or less…." The RES rule defines "renewable energy resources" to include "….hydropower…that does not require a new

diversion or impoundment of water and that has *generator* nameplate ratings of ten (10) megawatts or less…." Rule 4 CSR 240-20.100 (1)(K)8 (emphasis added). Renew Missouri asserts there is inconsistency in the interpretation between the statute and rule on qualifying hydropower and that the true meaning of name plate rating in the statute is the aggregate or the total generating capacity of the generating units at the station, not the capacity of each. Renew Missouri argues in its *Complaint* that Ameren Missouri's Keokuk hydroelectric plant and Empire's Osage Beach hydroelectric plant should not qualify as "renewable energy resources" and both utilities have failed to meet the RES because of the retirement of RECs generated by these facilities to meet the RES.

The RES is not ambiguous and the parties should interpret it using the plain and ordinary sense of the words, with technical terms understood according to technical import. Section 1.090 RSMo provides that: "[w]ords and phrases shall be taken in their plain or ordinary and usual sense, but technical words and phrases having a peculiar and appropriate meaning in law shall be understood according to their technical import." Missouri case law also supports this idea. *See generally Henry & Coatsworth Co. v. Evans,* 10 S.W. 868 (1889) and *Smith v. Missouri Pacific Railroad Co*., 44 S.W. 718 (1898)(In construing statutes, words of common use are to be construed in their natural and ordinary meaning); Lauck v. Reis, 274 S.W. 827 (1925)(In construing a statute, effect must be given, if possible, to every word thereof).

Since nameplate rating is an engineering term of art, one must read the statute and the rule using the technical meaning of "nameplate rating." See *generally Rose v. Franklin Life Ins. Co.*, 132 S.W. 613, 615 (1910) ("The words 'net value' being

technical words are to be taken in their technical sense…Their meaning is for the court who may ascertain their meaning by referring to persons who have knowledge on the subject or by consulting books of reference containing information thereon…It is important to ascertain whether the words had a settled technical meaning before the statute was enacted, as in that case we must assume that the Legislature used them in that sense.") (internal citations omitted). The United States Energy Information Administration defines nameplate capacity as "….the full-load continuous rating of the generator under specified conditions, as designated by the manufacturer, and is usually indicated on a metal plate attached to the generator."[1] A glossary of electric industry terms produced by the Edison Electric Institute defines nameplate capacity as "[t]he full-load continuous rating of a generator, prime mover or other electrical equipment under specified conditions as designated by the manufacturers. It is usually indicated on a nameplate attached mechanically to the individual machine or device."[2] There are several other technical references, as indicated in the table below, which indicate that nameplate rating and nameplate capacity are used interchangeably and that the rating is usually indicated on a nameplate attached to the individual machine or device.

Technical Reference	Definition
U.S. Energy Information Administration (EIA) [3]	**Rating:** "…The rating is generally printed on a nameplate attached to equipment and is commonly referred to as the nameplate rating or nameplate capacity."
EIA [4]	**Generator nameplate capacity (installed):** "....Installed generator nameplate

[1] http://www.eia.gov/cneaf/electricity/page/prim2/chapter2.html
[2] http://www.eei.org/meetings/Meeting%20Documents/TWMS-26-glossry-electerm.pdf
[3] http://www.eia.gov/tools/glossary/index.cfm?id=R
[4] http://www.eia.gov/tools/glossary/index.cfm?id=G

	capacity is commonly expressed in megawatts (MW) and is usually indicated on a nameplate physically attached to the generator."
U.S. Department of Energy 2011 Renewable Energy Data Book	**Nameplate Capacity:** "…Nameplate capacity is usually indicated in units of kilovolt-amperes (kVA) and in kilowatts (kW) on a nameplate physically attached to the generator."
U.S. Nuclear Regulatory Commission[5]	**Generator nameplate capacity:** "…Generator nameplate capacity is usually expressed in kilovolt-amperes (kVA) and kilowatts (kW), as indicated on a nameplate that is physically attached to the generator."

All of these sources support that nameplate capacity is specific to the generator, both for the statute and the Commission's rule.

For the sake of argument, if the statute were ambiguous, the Commission resolved any ambiguity by rule. The issue is with the utility's compliance with the specific rule, not the statute. In *State ex rel. Jackson County vs. Public Service Commission*, 532 S.W.2d 20 (1975), the case involved ambiguity between two Commission statutes that discussed methods for a utility's increase in rates. The Court said that the Commission's statutes must be read and interpreted together to avoid producing conflicts between the provisions. When reading the rate increase provisions in question together, the Court noted ambiguity but said "….we look to the construction which those assigned by law to administer those provisions have placed on them." *State ex rel. Jackson County*, 532 S.W.2d at 28. While the case at hand does not involve ambiguity between two statutes, the same principle of statutory construction applies.

[5] http://www.nrc.gov/reading-rm/basic-ref/glossary/generator-nameplate-capacity.html

The definition of hydropower as a renewable energy resource does not include the specific terms “aggregate”, “total generating capacity of the plant” or even “generator capacity.” However, the Commission, through the rulemaking process promulgated a rule that included the term “generator” when discussing nameplate ratings. While Renew Missouri now asserts Ameren Missouri and Empire have not met their portfolio requirements, no party to the RES rulemaking, including Renew Missouri, suggested changes to the nameplate rating language or the existence of a conflict between the statute and the proposed rule at that time. During the RES rulemaking workshop, the original wording of the definition for hydropower read:

8. Hydropower (not including pumped storage) that does not require a new diversion or impoundment of water and that has a generator nameplate capacity rating(s) of ten (10) megawatts or less;

In the **fifth revision**, the stakeholders made this change to the definition:

8. Hydropower (not including pumped storage) that does not require a new diversion or impoundment of water and that has generator nameplate ~~capacity~~ rating(s) of ten (10) megawatts or less;

In the **fourteenth revision**, the stakeholders removed the parentheses from the (s) following the word rating:

8. Hydropower (not including pumped storage) that does not require a new diversion or impoundment of water and that has generator nameplate ratings of ten (10) megawatts or less;

No stakeholder suggested any substantive change to the definition of “hydropower” to remove the word “generator” or add more description language, such as “aggregate generating capacity of the station” at that time.

The Missouri Department of Natural Resources ("DNR") certifies energy generation facilities as renewable energy generation facilities for use in compliance with the RES.[6] Rule 10 CSR 140-8.010, *Certification of Renewable Energy and Renewable Energy Standard Compliance Account*, "implements provisions of the Proposition C initiative petition[7] passed by Missouri voters on November 4, 2008…." The regulations of DNR contain a definition for hydropower. Paragraph (2)(A)8. of DNR's certification and compliance rule defines "Eligible Renewable Energy Resources" as

> Hydropower, not including pumped storage, that does not require a new diversion or impoundment of water and that *each generator* has a nameplate rating of ten megawatts *(10 MW) or less*. If an improvement to an existing hydropower facility does not require a new diversion or impoundment of water and incrementally increases the nameplate rating of *each generator*, up to ten megawatts (10 MW) *per generator*, the improvement qualifies as an eligible renewable energy resource[8]

(emphasis added). As discussed in the purpose of the rule, DNR's regulation intended to implement the provisions of Proposition C. The definition of hydropower within DNR's implementing rule is the same as the Commission's implementing rule, i.e., generator specific.

DNR provided written comments in File No. EW-2009-0324 dated March 23, 2009, regarding the meaning of hydropower nameplate rating:

> The statutory 10 MW upper limit on nameplate rating should apply to generating units not to aggregate capacity of the hydroelectric facility. As a consequence, power generated from the generating units of most run-of-river hydroelectric facilities should be eligible renewable resources, barring other undue adverse air, land or water impacts. This is true for existing run-of-river facilities such as AmerenUE's Keokuk facility and new run-of-river facilities proposed for the Mississippi and Missouri Rivers. [9]

[6] Rule 10 CSR 140-8.010 (4).
[7] Section 393.1025, et. seq.
[8] Rule 10 CSR 140-8.010 (2)(A)8.
[9] MDNR Comments on Commission RES Rule, March 23, 2009, Comment 4

Staff recommends the Commission grant summary determination on Count I of Renew Missouri's *Complaint* and find that the "nameplate ratings of ten megawatts or less" as used in the RES statute and rule is generator specific, not the aggregate generating capacity of facility as a whole, the Keokuk and Osage Beach facilities qualify for use to meet the portfolio requirements of the RES, and deny Renew Missouri's request for relief.

Renewable Energy Credit Banking

Renew Missouri alleges that Ameren Missouri and Empire have failed to meet the RES portfolio requirements by retiring RECs associated with renewable energy produced before January 1, 2011. In essence, this means all RECs used by the parties in meeting their renewable portfolio requirements for calendar year 2011 must have originated beginning January 1, 2011. However, nothing in the RES statute or rule suggests what era REC a utility must use in meeting the portfolio requirement.

As mentioned in the hydropower discussion, the Proposition C initiative petition[10] was passed by Missouri voters on November 4, 2008, and became effective the same date. The first year the RES required the electric utilities to meet the portfolio requirement was calendar year 2011. Ameren Missouri and Empire filed RES 2011 compliance reports with the Commission in April 2012, citing the retirement of pre-2011 RECs to comply with the RES.

As the cases and statute cited in the previous discussion indicate, the plain meaning of the statute's words control unless they have a technical meaning or the statute is ambiguous. The RES statute and rule are clear in defining a REC and its date of applicability or expiration. Section 393.1025(4), RSMo defines a "renewable energy

[10] Section 393.1025, et. seq.

credit" or "REC" as "….a tradeable certificate of proof that one megawatt-hour of electricity has been generated from renewable energy resources." Section 393.1030.2, RSMo provides that "[a]n unused [REC] credit may exist for up to three years from the date of its creation. A credit may be used only once to comply with sections 393.1020 to 393.1030." The RES rule is exact in application but reads slightly differently: "An REC represents that one (1) megawatt-hour of electricity has been generated from renewable energy resources…An REC expires three (3) years from the date the electricity associated with that REC was generated…." 4 CSR 240-20.100 (1)(J).

While Renew Missouri now argues a utility cannot use pre-2011 RECs to meet its 2011 Compliance Plan, no party to the RES rulemaking, including Renew Missouri, suggested changes to the language to require the use of 2011 RECs during 2011, or the existence of a conflict at that time. The original draft of the proposed rule contained the following subsection:

(3) Renewable Energy Credits.
(D) RECs, S-RECs and SO-RECs that are created after November 4, 2008 may be utilized for compliance with the RES.

In the **fourth revision** of the proposed rule, the Stakeholders annotated the following comment:

(3) Renewable Energy Credits.

(D) RECs, S-RECs or SO-RECs that are created after November 4, 2008 [[Stakeholder comment]: why 11/4/08? May be better to remove this section and let it default to beginning of 2008] may be utilized for compliance with the RES.

In the **seventh revision** of the proposed rule, the stakeholders relocated the 3-year requirement:

(3) Renewable Energy Credits.
(A) RECs are valid for a maximum period of three (3) years from the date of the REC creation.

In the **eighth revision**, the following language existed:

(3) Renewable Energy Credits.
(A) RECs are valid for a maximum period of three (3) years from the date of the underlying electrical generation.

In the **tenth revision and beyond**, the stakeholders relocated the language to the Definitions section of the rule:

(1) Definitions.
(I) REC, Renewable Energy Credit …… A REC expires three (3) years from the date the electricity associated with that REC was generated;

Nothing in these sections of the statute or final rule indicate in what year a utility must use a credit, other than a utility must use a credit prior to its expiration. As drafters of the voter initiative, Renew Missouri was very specific in providing dates for compliance with renewable energy portfolios in Section 393.1030.1, RSMo and could have applied that specificity to the dates for the applicability of RECs. Renew Missouri's identification of what they describe as a "loophole" does not give them the authority to alter a clear statute and rule without going through the proper avenues to do so. As the statute reads, it is clear in that a REC exists for a utility's use up to three years from its creation. Even if one argues ambiguity, a court will look to the construction which those assigned to administer the law have placed on them. The RES statute directs the Commission, in consultation with DNR, to propose a rule to implement the RES.

Further, the RES statute contains the following provision: "The commission, in consultation with the department and within one year of November 4, 2008, shall select a program for tracking and verifying the trading of renewable energy credits."[11] This begs the question why a tracking system would need to be in place prior to the first

[11]

compliance year if the intention was not to bank pre-2011 RECs for use in the portfolio requirement. On December 16, 2009, the Commission selected APX, Inc., to provide a REC tracking system. APX, Inc., designed the North American Renewables Registry ("NAR") to track RECs created on or after July 1, 2007, which are obviously pre-2011 RECs.

Staff recommends the Commission grant summary determination on Count II of Renew Missouri's *Complaint* and find that the RES statute and rule allow pre-2011 RECs for use to meet the portfolio requirements of the RES, and deny Renew Missouri's request for relief.

Geographic Sourcing/Unbundled RECs

Count III of Renew Missouri's *Complaint* alleges Ameren Missouri has failed to comply with the RES because the utilities have retired "unbundled" SRECs that are not associated with power sold to Missouri ratepayers. Staff recommends the Commission grant summary determination on this count of the *Complaint* and find the RES statute and rule allow utilities to purchase RECs that are not associated with power sold to Missouri ratepayers.

The Commission, consulting with DNR, has rulemaking authority for the renewable energy portfolio requirement. The RES directs the Commission, in consultation with DNR, to propose a rule to implement the renewable energy standard. Prior to publishing the draft rule in the Missouri Register, the Commission held a series of workshops that allowed parties to participate through discussion and written comment. After the Commission approved the proposed rule, it was printed in the Missouri Register and formal comments were accepted in the rulemaking docket.

As with the hydropower and REC banking issues discussed above, Renew Missouri participated in the workshops and rulemaking. As background, the Commission voted on June 2, 2010, to authorize the filing of the final order of rulemaking to promulgate Rule 4 CSR 240-20.100. On July 1, 2010, the Joint Committee on Administrative Rules ("JCAR") voted to disapprove subsection (2)(A) and paragraph (2)(B)2. of the rule. On July 6, 2010 the Commission voted to submit the Revised Order of Rulemaking for publication without subsection (2)(A) and paragraph (2)(B)2 and that these parts be reserved for later use. The effective RES rule does not contain the geographic sourcing provisions.

Section 393.1030.1 states "The portfolio requirements shall apply to all power sold to Missouri consumers whether such power is self-generated or purchased from another source in or outside of this state. A utility may comply with the standard in whole or in part by purchasing RECs." Renew Missouri uses this section to argue the RES requires utilities to use RECs bundled with renewable energy delivered to Missouri ratepayers to meet the portfolio standard. Renew Missouri acknowledged a different understanding of the RES statute during the RES rulemaking.

During the rulemaking Renew Missouri's Director PJ Wilson responded to comments made by Ameren Missouri and agreed that a utility can buy RECs separately from underlying electricity: ""Ameren also commented that the REC should be able to be purchased separately from underlying electricity. Agree with that." [12] Further, Renew Missouri issued a press release around the time of JCAR's July 2010 action to remove the geographic sourcing provision. The press release, attached hereto, stated in part

[12] EX-2010-0169, Transcript Volume 1, Page 284, Line 1.

"Without this [geographic sourcing] provision, utilities can meet the RES targets by buying renewable energy credits or RECs from anywhere in the world."[13]

There are provisions in the effective RES rule that contemplate the use of RECs unbundled from energy. The purchase of unbundled RECs is mentioned in 4 CSR 240-20.100(6)(B)5.J., which states in part, "For purchase of electrical energy from eligible renewable energy resources bundled with the associated RECs or for the purchase of unbundled RECs…," as well as Rule 4 CSR 240-20.100(7)(B)1.B., which states in part "A list of executed contracts to purchase RECs (whether or not bundled with energy)..."

Staff recommends the Commission grant summary determination on Count III of Renew Missouri's *Complaint* and find that the RES statute and rule allow unbundled RECs for use to meet the portfolio requirements of the RES, and deny Renew Missouri's request for relief.

Solar Exemption

In Count III of Renew Missouri's *Complaint* against Empire, Renew Missouri alleges Empire has not met the solar requirement of the RES portfolio standard and must be held to the terms of the RES because Section 393.1050, RSMo was unlawfully passed or, if initially valid, was repealed. Section 393.1050 provides:

> *Notwithstanding any other provision of law*, any electrical corporation…which, by January 20, 2009, achieves an amount of eligible renewable energy technology nameplate capacity equal to or greater than fifteen percent of such corporation's total owned fossil-fired generating

[13] It is not possible for utilities to meet the RES requirements by purchasing RECs from anywhere in the world. RECs must be registered in the Commission approved tracking system. The Commission approved tracking system, NAR, allows importing of RECs from tracking systems which are compatible with NAR such as Western Renewable Energy Generation Information System ("WREGIS") and Midwest Renewable Energy Tracking System ("MRETS").

> capacity, shall be exempt thereafter from a requirement to pay any installation subsidy, fee, or rebate to its customers that install their own solar electric energy system and shall be exempt from meeting *any* mandated solar renewable energy standard requirements….

Emphasis added.

Renew Missouri has raised the same arguments before the Circuit Court of Cole County and most recently before the Western District Court of Appeals in *Evans v. Empire District Electric Company*. In that case, the Court stated:

> [t]he present dispute is whether a challenge to a statute, which purports to exempt certain utility companies from providing a rebate to customers who install solar electric systems is in irreconcilable conflict with the provision of a statute adopted by an initiative petition (Proposition C), is a matter which must be considered first by the PSC.

Evans v. Empire District Electric Company, 2011 WL 2118937, p. 4, (Mo. App. W.D., 2011). While the Court did not express an opinion as to the merits of the claims, it stated:

> The PSC has the power to determine if the provisions of Proposition C are in irreconcilable conflict or can in fact be harmonized with the provisions of section 393.1050. Appellants [including Renew Missouri] are able *to file a complaint* with the PSC under 4 CSR 240-2.070 and section 386.390 and the PSC is able to grant relief.

Id. (emphasis added).

Staff generally agrees with the analysis provided by Empire in its *Motion to Dismiss Complaint*. While the Commission has the jurisdiction to determine if the provision of the RES statute and Section 393.1050 can be harmonized, it does not have the jurisdiction, as Renew Missouri suggests, to declare Section 393.1050 void. Staff recommends the Commission grant summary determination on Count III of Renew

Missouri's *Complaint* against Empire, find that the RES statute and Section 393.1050 are harmonized, and deny Renew Missouri's request for relief.

Summary

WHEREFORE, Staff submits this response for the Commission's information and consideration and recommends that the Commission issue an Order that denies all relief requested by Renew Missouri.

Respectfully submitted,

/s/ Jennifer Hernandez
Jennifer Hernandez
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Missouri Bar No. 59814

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on this **16th day of August 2013** to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Jennifer Hernandez

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OF THE STATE OF MISSOURI

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Complainants,	)	
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Earth Island Institute d/b/a Renew Missouri et al.	)	
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v.	)	File No. EC-2013-0378
The Empire District Electric Company,	)	
Respondent.	)	

AFFIDAVIT OF DANIEL I. BECK

STATE OF MISSOURI)
) **ss**
COUNTY OF COLE)

Daniel I. Beck, of lawful age, on oath states: that he participated in the preparation of the foregoing Answers to Dispositive Motion, to be presented in the above case; that he has knowledge of the matters set forth; and that such matters are true and correct to the best of his knowledge, information and belief.

Daniel I. Beck

Subscribed and sworn to before me this 16th day of August, 2013.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 03, 2014
Commission Number: 10942086

Notary Public

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JCAR Decision Would Drive Clean Energy Jobs and Economic Development Out of Missouri

Keep Clean Energy Jobs and Development Close to Home

In January, Vote No on JCAR's Attempt to Gut the MO RES

JCAR recently removed a critical provision from Proposition C, the Missouri Renewable Electricity Standard (RES).

If their decision stands, renewable energy will not be developed in-state, as voters expected and our state economy desperately needs.

A 2008 University of Missouri-St. Louis study predicts RES will create 9,591 jobs and generate $2.86 billion in economic activity in Missouri by 2021. Without geographic souring, little or no in-state development will occur.

Keeping geographic sourcing in the RES will put Missourians to work manufacturing, installing, and maintaining wind farms, biomass plants, and solar panels.

The RES's 1% rate cap protects consumers, regardless if the energy is developed in Missouri or anywhere in the world.

In January, Vote NO on the JCAR decision to gut the Missouri Renewable Electricity Standard.

MO Renewable Energy TIMELINE

November 2008: Missouri voters passed the Missouri RES in 2008 with 66% of the vote. The law requires Missouri investor-owned electric utilities to get 15% of their energy from local, renewable energy resources such as solar panels and wind turbines by 2021. Missouri is the 27th state to have an RES.

June 2010: The PSC approved a fair set of rules that were favorable to the development of in-state renewable energy and consistent to the law voters passed.

July 2010: The Joint Committee on Administrative Rules (JCAR) removed a key provision that requires the renewable energy from the RES to come from within or near Missouri. The provision is called "geographic sourcing." Without this provision, utilities can meet the RES targets by buying renewable energy credits or RECs from anywhere in the world.

The Missouri Renewable Electricity Standard is expected to create 9,591 jobs and generate $2.86 billion in economic activity to Missouri by 2021. The JCAR Decision could drop this number to 0.

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[PDF] ex-2010-0169 transmittal of order filed with jcar and sos.pdf
https://www.efis.psc.mo.gov/mpsc/.../viewdocument.asp?DocId...
Jan 26, 2011 - **geographic sourcing** provisions of its rule that were disallowed by the Joint ... **JCAR** acknowledge the receipt of the Commission's order.

Letters to the editor, August 27 : Stltoday
www.stltoday.com › News › Opinion › Mailbag
Aug 27, 2010 - And its removal of the provision undercuts the will of voters who voted for the **geographic sourcing** requirement. Fortunately, the **JCAR** revision ...

[PDF] Wind Coalition and Polsinelli Shughart Join Forces to Protect ...
www.polsinelli.com/files/.../PS_RenewableNews_Spring2011.pdf
Mar 1, 2011 - Later, the legislative Joint Committee on. Administrative Rules (**JCAR**) disapproved the rule relating to **geographic sourcing**. The legislative.

Less-Restrictive Renewable Energy Rules To See Lawsuit
ozarksfirst.com/fulltext?nxd_id=291405
Jul 6, 2010 - The PSC and **JCAR** recommended that the Missouri legislature debate the future of the **geographic-sourcing** language. Committee member ...

[PDF] JCAR Decision Would Drive Clean Energy Jobs ... - Renew Miss...
www.renewmo.org/uploads/3/6/4/0/3640039/**jcar**factsheetfinal.pdf
JCAR recently removed a critical provision ... Without **geographic** souring, little or no in-state development will occur. Keeping **geographic sourcing** in the RES ...

Revised Proposition C Could Hamper Development In Missouri
www.nawindpower.com › News Departments › Policy Watch
Feb 10, 2011 - However, the **geographic sourcing** provisions included in the PSC's rules ... on Administrative Rules (**JCAR**) voted to remove the provision that ...

Ameren - Missouri's Renewable Energy Standard -- An Important ...
www.moenergy.org/october-edition/125.html
The final issue regarding **geographic sourcing**/bundling was ruled on by the **JCAR**. The committee disapproved the related sections of the rule (2) (A) and (2) (B) ...

Results for similar searches

[PDF] Deciding Where to Source - Local, National, Regional, or Global ...
food-hub.org/.../Deciding%20Where%20to%20Source%20-%20Local,%...
sourcing efforts have also occurred. Not every commodity or service is suited for the long distance buy. It is critical to understand the **geographical** drivers of your ...
More results for **geographical sourcing**

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With a background in mechanical and precision engineering, he has taken his education, knowledge and passion for cars and created a new **car-sourcing** ...
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