Mr. Steven C. Reed Secretary Missouri Public Service Commission 200 Madison Street P.O. Box 360 Jefferson City, MO 65102-0360

Re: In the Matter of a Workshop File to Explore Legislative and Regulatory

Means to Improve and Clarify Missouri's Renewable Energy Standard Law,

Mo. Rev. Stat. §§ 393.1020 to 393.1030

Case No.: EW-2011-0031

Dear Mr. Reed:

The contents of the attached policy proposal have been prepared and jointly agreed to by The Wind Coalition and Wind on the Wires ("The Wind Group"), by the Missouri Solar Energy Industry Association and SunEdison ("The Solar Group"), and by Renew Missouri.

The policy proposal expresses the basic position that such groups will support through the regulatory process. It is not a legislative draft nor should it be considered one by any participant to these proceedings. It is a detailed proposal that expresses potential alternatives, shared by The Wind Group, The Solar Group and Renew Missouri, to implement the renewable energy standard in Missouri that furthers the goals and intent of Proposition C, the PSC rules and is offered only within the context of the workshop discussions.

The draft of the proposed rule changes provides a red-line draft with both deletions and insertions. Certain sections have been included which contain no changes and are included in an effort to provide adequate context for which to view the proposal. It should also be noted that certain sections of the rule are not contained in the proposal, this omission is for efficiency and nothing should be interpreted otherwise. In addition, this proposal only contains insertions and deletions which are necessary to convey the basic position of the proposal, therefore, if any provision were to be adopted, it would require that the remainder of the rule be revised to be consistent with the adopted provisions.

The policy proposal contains two retail rate impact proposals analyzed with respect to Ameren's data. The first is a proposal establishing a rate cap of 1% on the costs incurred to comply with the renewable energy standard that is based on an electric utility's most recently approved revenue requirement. The second is the proposal put forth by The Wind Group, The Solar Group and Renew Missouri at the December 7th meeting, based on a rate cap of 1% of the net present value of an electric utility's projected revenue requirement in its most recent integrated resource plan. The attached spreadsheet is a modification of the model Ameren Missouri had provided on December 10th and corresponds with the document entitled, Proposal Option 1: Based on 1% of Current

Revenue Requirement. A spreadsheet has not been developed for Proposal Option 2 because the utilities need to assist in integrated resources process sensitivities analysis.

The Wind Group, The Solar Group and Renew Missouri specifically reserve the right to modify or amend the contents of this policy proposal as further discussions and negotiations are conducted. Significant time and effort has been expended to develop the language of this proposal. Thus, the proposal should be considered in its entirety and any modifications to specific provisions will affect the joint group's ability to support the overall proposal. We further specifically reserve the right to have a legislative proposal introduced in the Missouri General Assembly without prior notice to any participant to these proceedings.

Very truly yours,

Sean R. Brady
Regional Policy Manager -- East

Wind on the Wires

858 West Armitage Avenue, Suite 239 Chicago, IL 60614 312.867.0609 sbrady@windonthewires.org