

FILED²

MAY 15 2003

Missouri Public
Service Commission

**Submittal of Comments Regarding Proposed "Net Metering" Rule
(Missouri PSC Case No. EX-2003-0230)**

Submitted by The Empire District Electric Company

On behalf of The Empire District Electric Company, I submit the following comments regarding the Proposed "Net Metering" Rule (Case No. EX-2003-0230) as published in the April 15th, 2003, Missouri Register (Volume 28, No. 8):

Although the rule as proposed may not be "perfect" from any of the affected parties' perspectives, it is the result of joint collaboration and consensus of the parties involved in the technical meetings and discussions held over the past 9 months. These parties included representatives from the Public Service Commission Staff, the Department of Natural Resources, the Office of Public Counsel, the Missouri Clean Air Coalition, the Missouri Investor-Owned Utilities, the Missouri Rural Electric Cooperatives, the Missouri Municipal Utilities, and at least one member of the Missouri Legislature. I understand that the proposed rule also resolves the legal and clerical issues identified by the Missouri Attorney General's office.

We believe this proposed rule meets all of the requirements set forth in Section 386.887, RSMo Supp. 2002; as well as all of the existing federal rules mandated by PURPA. This proposed rule is a good "first step" in establishing a consistent statewide "standard" for the interconnection of customer-owned clean energy generators to the electricity grid in Missouri. However, as with any rule, it will likely need to be reviewed and updated periodically as Missouri's utilities and customers gain experience with existing forms of clean energy technology and/or as new clean energy technologies evolve.

Based on the comments above, I hereby submit Empire District Electric Company's endorsement of the proposed net metering rule as published.

Respectfully submitted this 15th day of May, 2003,

Mike Palmer, Vice-President
Commercial Operations
The Empire District Electric Company