

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

In The Matter of a Determination of Special)
Contemporary Resource Planning Issues to be)
Addressed by KCP&L Greater Missouri)
Operations Company in its Next Triennial)
Compliance Filing or Next Annual Update Report)

File No. EO-2013-0107

LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES OF SIERRA CLUB

Pursuant to 4 CSR 240-22.080(4), the Sierra Club hereby recommends the following as special contemporary issues for consideration and analysis by Kansas City Power & Light Greater Missouri Operations Company (“GMO”). While many of these issues should be evaluated in GMO’s currently pending integrated resource plan filing in File No. EO-2012-0324, prudent utility planning also calls for GMO to continue evaluating these issues, on the basis of up-to-date information, in its annual update reports and triennial compliance filings.

1. The prospects for continued stability of natural gas prices, especially in light of unconventional gas supplies;
2. Developing and documenting for use in all economic modeling and resource planning low, base, and high natural gas price projections that are derived from natural gas price forecasts that were created within three months of the modeling and planning that such projections are used in;
3. Analyzing and documenting the future capital and operating costs faced by each GMO coal-fired generating unit in order to comply with all existing, pending, or potential environmental standards, including:
 - Clean Air Act New Source Review provisions
 - 1-hour Sulfur Dioxide National Ambient Air Quality Standard

- Cross State Air Pollution Rule in the event the Rule is reinstated
 - Clean Air Interstate Rule
 - Mercury and Air Toxics Standard
 - Clean Water Act 316(b) Cooling Water Intake Standards
 - Clean Water Act Steam Electric Effluent Limitation Guidelines
 - Clean Air Act Section 111 Greenhouse Gas New Source Performance Standards
 - Clean Air Act Regional Haze requirements
 - Coal Combustion Waste rules
4. Analyzing and documenting the cost of any transmission grid upgrades or additions needed to address transmission grid reliability, stability, or voltage support impacts that could result from the retirement of any existing GMO coal-fired generating unit;
 5. Analyzing and documenting on a unit-by-unit basis the net present value revenue requirement of the relative economics of continuing to operate each GMO coal-fired generating unit versus retiring and replacing each such unit in light of all of the environmental, capital, fuel, and O&M expenses needed to keep each such unit operating and the cost of other demand side and supply side resources;
 6. Analyzing and documenting low, base, and high scenarios of projected off-system sales revenues under a range of assumed natural gas prices, CO2 prices, and coal prices;
 7. Analyzing and documenting on a unit-by-unit basis the net present value revenue requirement of the cost of continuing to operate each GMO coal unit in light of all of the environmental, capital, fuel, and O&M expenses needed to keep each such unit operating versus the revenue generated by the continued operation of each such unit under low, base, and high scenarios of projected off-system sales revenues;

8. Analyzing and documenting the technical, maximum achievable, and realistic achievable energy and demand savings from demand side management, and incorporating each level of savings into GMO resource planning process.
9. Analyzing and documenting whether each of the following levels of cumulative annual savings are technically or realistically achievable through demand side management:
 - 0.5% energy savings
 - 0.5% demand savings
 - 1% energy savings
 - 1% demand savings
 - 1.5% energy savings
 - 1.5% demand savings
10. Analyzing and documenting the levels of achievable combined heat and power and incorporating such achievable CHP into GMO's evaluation of demand side management.

Respectfully Submitted:



Shannon Fisk
Earthjustice
1617 John F. Kennedy Blvd., Suite 1675
Philadelphia, PA 19103
(212) 791-1881 ext. 8239
sfisk@earthjustice.org

/s/ Henry B. Robertson
Henry B. Robertson
Great Rivers Environmental Law Center
705 Olive Street, Ste. 614
St. Louis, MO 63101
(314) 231-4181
hrobertson@greatriverslaw.org

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing **LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES OF SIERRA CLUB** have been transmitted electronically to all counsel of record this 17th day of September, 2012.


