

IRP Rule Revision Workshop

EW-2009-0412

The Empire District Electric Company

January 25, 2010



SERVICES YOU COUNT ON

Integrated Resource Planning or IRP Rule

Current rule:

- 1) Load Analysis and Forecasting
- 2) Supply-Side Resource Analysis
- 3) Demand-Side Resource Analysis
- 4) Integrated Resource Analysis
- 5) Risk Analysis and Strategy Selection
- 6) Filing Schedule and Requirements
- 7) Definitions and Objectives

Proposed Staff addition:

Transmission and Distribution Analysis

Empire Participation To Date

- Participated in all workshop meetings to date
- Responded to two sets of Staff questions
- Presentation to the Commission August, 2009
- Filed comments in December, 2009
- Presentation to the Commission January, 2010

Reasons for Revising The IRP Rules

- Current rule outdated
 - ▶ Particularly outdated was the end-use forecasting requirement
- Address recent waiver requests
- Eliminate redundancy
- Make the rule easier to understand
- Streamline the process
- More flexibility
- Recognize the differences in utilities
- Focus on the outcome rather than be a process checklist
- Reduce the risk of rule obsolescence
- Work with all stakeholders to develop the best new rule we can
- Make it a more meaningful process

Some Major Changes To Date

- Annual updates in addition to triennial filings
- Contemporary issues
- Staff draft contains a new transmission & distribution analysis rule
- Staff and MEDA have both introduced draft rules

Empire Suggestion During the Workshop Process

- Have a simpler less detailed rule
 - That meets the “reasons for revising the IRP Rule” from a previous slide
- During a pre-filing meeting develop a scope document for the upcoming filing (“A Plan for the Plan”)
 - Incorporate the contemporary issues
 - It would make the process more utility specific
 - IRP requirements allowed to change over time
 - Help keep the rule from becoming obsolete
 - Could be concurrent with an annual update to limit meetings

Conclusion

- In order to adequately address the reasons for revising the rule:
 - Simpler less detailed rule
 - “Plan for the Plan” side document
 - The MEDA draft rule should become the starting point for further discussions

Contact Information

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