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

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| In the Matter of an Investigation of the Cost to Missouri's Electric Utilities Resulting from Compliance with Federal Environmental Regulations | ) ) ) | File No. EW-2012-0065 |

**Sierra Club's Response to Various Stakeholders' Comments**

INTRODUCTION

Sierra Club appreciates the opportunity to provide the following comments responding to other stakeholders in this docket. We believe that our comments filed on August 25, 2014 sufficiently address most of the concerns set forth by other stakeholders, and we incorporate our prior comments herein by reference.[1] In these comments, we first wish to focus on topics that appear to be a thread throughout the other stakeholders' comments—specifically, Building Blocks 1 and 4. We conclude by addressing comments from Peabody Energy Company.

Building Block 1—Heat-Rate Improvements

Several stakeholders strongly take issue with EPA's 6% statewide heat-rate improvement proposal, with reactions ranging from skepticism to strident disbelief. KCP&L and GMO "do not expect that a 6% remaining coal fleet heat rate improvement is reasonably achievable."[2] KCP&L and GMO note that they have identified 35 potential projects that would reduce heat rate by 1.6%.[3] Ameren Missouri ("Ameren") claims that "[a] 6% improvement in efficiency across [its] fleet, on either a net or gross basis, is not achievable."[4] Ameren supports this comment by briefly listing several implemented and prospective projects.[5] Empire opines that "projects that have been completed prior to 2012 will not be counted toward the 6% heat rate improvement goal … [making] it extremely difficult, if not impossible, to achieve an additional 6% improvement."[6] Finally, AMEC / AECI put it bluntly—"[t]he 6% power plant efficiency improvement projected in the EPA model is not achievable."[7]

There are a few important points to remember regarding stakeholder comments on Building Block 1. First, the utilities may confuse a relative increase in efficiency with an absolute increase in efficiency. For example, an increase in efficiency from 36% to 39% is a

[1] *See generally In the Matter of an Investigation of the Cost to Missouri's Electric Utilities Resulting from Compliance with Federal Environmental Regulations*, File No. EW-2012-0065, Dkt. No. 78.
[2] File No. EW-2012-0065, Dkt. No. 79, Exh. 1 at 1.
[3] *See id.*
[4] File No. EW-2012-0065, Dkt. No. 81 at 1.
[5] *See id.* at 1–4.
[6] File No. EW-2012-0065, Dkt. No. 83, Empire's Response to Order Directing Response to Certain Questions at 1.
[7] File No. EW-2012-0065, Dkt. No. 82 at 6.

relative increase of about 8% (3/36), but an absolute increase of only 3% (39-36). EPA's Building Block 1 refers to a 6% increase in the heat rate of an affected unit, and therefore requires only a relative 6% improvement in the efficiency of the unit and an absolute improvement of slightly over 2%. Associating Building Block 1 with an absolute 6% efficiency improvement, as some utilities may be doing, exaggerates the reductions projected assumed under that Block.

Second, the Clean Power Plan does not actually require each and every affected EGU to improve its heat rate efficiency by 6%. Rather, EPA has estimated that a 6% average statewide reduction in the $CO_2$ emission rate of the coal-fired EGUs is a reasonable estimate of the amount of heat-rate improvement that can be implemented at a reasonable cost through a combination of best practices and equipment upgrades. Missouri can almost certainly achieve a 6% heat-rate improvement as averaged across the state's coal-fired fleet—particularly because EPA's 6% heat-rate improvement target is conservative, as we discussed in our comments submitted on August 25, 2014.[8]

Lastly, EPA is merely proposing a 6% heat-rate improvement goal as part of the BSER. Building Block 1 is, emphatically, not a requirement, and states can use any combination of building blocks as long as the carbon reduction goals are equivalent to or more stringent than the proposed state target.

As a productive next step regarding Building Block 1, we encourage the Commission to require utilities to catalog efficiency improvements already taken at each plant, providing a complete description of each improvement, the cost of the project, the anticipated and actual heat rate improvement achieved, the anticipated degradation in performance of the project, and the date it was undertaken. Ameren's accounting, for instance, is insufficient, as it includes generic descriptions, no dates or costs, and no heat-rate improvement percentages.[9] A meticulous accounting of prior projects, scrutinized by the PSC and interested stakeholders, will provide a critically important baseline for the state to determine what additional efficiency improvement options are available. Further, this information will be crucial to an approvable state implementation plan.

Building Block 1—New Source Review

A number of stakeholders are concerned about heat-rate improvement projects and their implications on New Source Review ("NSR"). KCP&L and GMO indicate that they will provide comments to EPA on this topic,[10] Empire affirmatively calls for exemptions from NSR for "projects that are required for heat rate improvements under the Clean Power Plan,"[11] and AMEC / AECI beseech EPA to exempt from NSR "any modifications made at existing facilities to improve plant efficiency."[12]

[8] *See* File No. EW-2012-0065, Dkt. No. 78 at 5.
[9] *See* File No. EW-2012-0065, Dkt. No. 81 at 1–3.
[10] *See* File No. EW-2012-0065, Dkt. No. 79, Exh. 1 at 6.
[11] File No. EW-2012-0065, Dkt. No. 83, Empire's Response to Order Directing Response to Certain Questions at 1.
[12] File No. EW-2012-0065, Dkt. No. 82 at 14.

There are three main points to consider regarding plant efficiency and NSR. First, the efficiency improvements contemplated by Building Block 1 would reduce emissions of all pollutants per megawatt hour; any increase in pollutants that could trigger NSR[13] would only result if the unit produces more power after the efficiency upgrades (and thereby increases its sales). Efficiency upgrades, however, need not result in increased power generation. In fact, EPA does not foresee many instances where an NSR permit would be required.[14] States have wide latitude to develop plans that meet the emissions guidelines, and the balancing of building blocks could obviate permits for units that would otherwise trigger NSR. For instance, increased renewable energy or reduced demand via energy efficiency could reduce criteria pollutant emissions at a unit sufficient that the NSR threshold would not be exceeded.[15]

Second, if utilities pursue projects that cause a net increase in criteria pollutant emissions, the operators are welcome to obtain a synthetic minor limitation. This limit would be included as part of an approvable state implementation plan to allow a net increase in carbon emissions, but constrain that increase such that it would not trigger NSR.

Finally, if an operator does not wish to pursue the aforementioned options, then it will likely profit from the increased capacity or life-extending properties of its projects that trigger NSR. Accordingly, the appropriate local, state, and federal permitting program will ensure that NSR permits are in place to minimize any impacts resulting from increased pollution and address any environmental justice concerns.[16]

Building Block 4

For all states, including Missouri, EPA estimated that utilities would need to achieve an incremental 0.2% of savings *each* year, with an annual energy savings of 1.5% no later than 2025, in order to comply with the proposed rule. Moreover, Missouri would need to sustain that level through 2030. EPA's projection results in cumulative energy savings of approximately 10% by 2030, after accounting for the retirement of efficiency measures over time. EPA's energy efficiency target is reasonable given that these levels of efficiency savings are in line with the reductions achieved in other jurisdictions, as well as the achievable potential in numerous studies.[17]

The targets set forth by EPA may actually underestimate energy efficiency potential in some cases, especially where states have already begun to ramp up their savings goals. For

[13] After the Supreme Court's decision in *Utility Air Reg. Grp. v. EPA*, 134 S. Ct. 2427 (2014), only projects that increase emissions of criteria pollutants—not greenhouse gases—can trigger NSR.
[14] Carbon Pollution Emission Guidelines for Existing Stationary Source: Electric Utility Generating Units, 79 Fed. Reg. 34,830, 34,928 (June 18, 2014).
[15] *Id.*
[16] *Id.* at 34,949.
[17] *See* EPA, Technical Support Document for Carbon Pollution Guidelines, GHG Abatement Measures § 5, Docket ID No. EPA-HQ-OAR-2013-0602 (June 2014), *available at* http://www2.epa.gov/sites/production/files/2014-06/documents/20140602tsd-ghg-abatement-measures.pdf.

Building Block 4, EPA first evaluated the states' energy efficiency potential and found that the twelve leading states have achieved—or will achieve with existing requirements—annual incremental savings rates of at least 1.5% of the electricity demand that would have otherwise occurred.[18] Based on this assessment of best practices, EPA determined that each state's annual incremental savings rate should increase from its 2012 annual savings rate to a rate of 1.5% over a period of years starting in 2017.[19] The increase to 1.5% will take place at a rate of 0.2% incremental savings per year,[20] so states that are already near 1.5% will reach their target rate sooner than states that have not yet implemented much demand-side energy efficiency. Any states that have already achieved 1.5% in 2012 are assumed to maintain that rate from 2017 through 2029. All states are expected to reach the 1.5% target rate by 2025 at the latest.

Stakeholder comments regarding Building Block 4 spotlight the utilities' business models and relative ambitiousness. On one side, Ameren and Empire balk at the goal, with Ameren describing EPA's 2020-2029 targets as "likely unattainable,"[21] and Empire labeling the proposal "challenging."[22] Ameren took the time to develop a presentation purportedly identifying flaws with the DSM Potential Studies used by EPA.[23] On the other side, KCP&L and GMO appear copasetic, recounting their existing efficiency portfolios and determining that they will both exceed EPA's 9.92% cumulative 2030 target.[24] KCP&L and GMO further state that EPA's goal to eliminate 8.7 million MWh of generation via energy efficiency appears achievable based on calculations in their IRPs,[25] whereas Ameren calls it "unattainable"[26] and Empire declares it "difficult to quantify."[27] What accounts for this divergence?

Energy efficiency is not only one of the fastest, cheapest, and safest ways to help meet the state's growing electricity demand, but it is also a proven, low-cost way for utilities to meet their respective carbon pollution reduction goals under the Clean Power Plan. EPA's Regulatory Impact Analysis for the Clean Power Plan cites two studies finding that demand-side efficiency improvements can be realized at less cost than the savings from avoided power generation.[28]

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[18] *Id.* at 5-33.

[19] Each state's 2012 reported annual savings rate is assumed to be the starting point for 2017 calculation of the state target.

[20] *See* EPA, Technical Support Document for Carbon Pollution Guidelines, GHG Abatement Measures at 5-35.

[21] File No. EW-2012-0065, Dkt. No. 81 at 8.

[22] File No. EW-2012-0065, Dkt. No. 83, Empire's Response to Order Directing Response to Certain Questions at 4.

[23] *See* File No. EW-2012-0065, Dkt. No. 81 at 17, EPA Proposed GHG Rule: Building Block 4 – Energy Efficiency Potential (Aug. 14, 2014).

[24] *See* File No. EW-2012-0065, Dkt. No. 79, Exh. 1 at 5.

[25] *Id.*

[26] File No. EW-2012-0065, Dkt. No. 81 at 8.

[27] File No. EW-2012-0065, Dkt. No. 83, Empire's Response to Order Directing Response to Certain Questions at 5.

[28] U.S. EPA, Regulatory Impact Analysis for the Proposed Carbon Pollution Guidelines for Existing Power Plants and Emission Standards for Modified and Reconstructed Power Plants 2-14 (June 2014) ("RIA"), *available at* www.epa.gov/ttn/ecas/regdata/RIAs/111dproposalRIAfinal0602.pdf.

Even EPA's low estimates of energy efficiency costs have been criticized as too high.[29] On average, energy efficiency programs now cost 2.8 cents per kilowatt hour (kWh)[30]—one-half to one-third as much as supply-side alternatives[31]—and their costs are continuing to fall.

Separately, EPA's building block methodology does not explicitly consider the costs avoided by energy efficiency programs as a result of reduced dispatch of fossil resources. Although there are likely modest near-term costs associated with ramping up the state's energy efficiency portfolio, the concomitant avoided generation would likely displace the need for an equivalent amount of in-state coal-fired generation in Missouri. Sierra Club believes that any accounting of costs related to increased energy efficiency program implementation should account for that avoided cost; electric dispatch modeling would be necessary to ascertain the precise size of this share.

In addition to representing the cheapest option for GHG emissions reduction, energy efficiency programs stimulate local economic development by creating new jobs and spurring technological innovation.[32] AMEC / AECI succinctly state that "[t]he cheapest MWh is the one never generated."[33] It appears that KCP&L and GMO have taken this to heart, and the only thing holding back Ameren and Empire is leadership.

Peabody Energy Company's Comments

We believe that our August 25, 2014 comments sufficiently address the majority of Peabody's comments; consequently, we wish to use this opportunity to focus specific attention on Peabody's misleading discussion of rate impacts. Peabody begins by castigating EPA for its apparent effort to turn Missouri, with its "low-cost, reliable energy, into California."[34] EPA "glowingly cites California as a model state" on carbon regulation and energy policy, which Peabody finds disconcerting, given California's energy prices.[35]

[29] *See* Molina (below) at 34–37; Megan A. Billingsley, et al., Lawrence Berkeley Nat'l Lab., The Program Administrator Cost of Saved Energy for Utility Customer-Funded Energy Efficiency Programs 52–57 (Mar. 2014), *available at* http://emp.lbl.gov/sites/all/files/lbnl-6595e.pdf.
[30] Maggie Molina, Am. Council for an Energy-Efficient Economy, The Best Value for America's Dollar: A National Review of the Cost of Utility Energy Efficiency Programs at 39 (Mar. 2014), *available at* aceee.org/research-report/u1402.
[31] *Id.* at 34, 39.
[32] *See* EPA, Technical Support Document for Carbon Pollution Guidelines, GHG Abatement Measures at 5-7–5-9.
[33] File No. EW-2012-0065, Dkt. No. 82 at 13–14.
[34] File No. EW-2012-0065, Dkt. No. 77 at 4.
[35] *Id.* To help support this notion, Peabody includes an attachment, which indicates that the word "California" is mentioned more often than other states in the Clean Power Plan. *See* File No. EW-2012-0065, Dkt. No. 77, Att. A at 13. Although just as irrelevant and logically fallacious as the last citation, it is noteworthy that Peabody uses a similar slide in its very next attachment that references completely different numbers. *See* File No. EW-2012-0065, Dkt. No. 77, Att. B at 16. Peabody's sloppiness with the facts is telling.

The implication appears to be that, because Missouri has a coal-heavy electric generation fleet, it has a corresponding lower cost of electricity. This is apparently in contrast to California (and other states), which Peabody implies has a higher cost of electricity due to lower percentages of coal generation and higher percentages of investments in energy efficiency and renewables. Indeed, Peabody states that "[c]oal is an essential component to maintaining reasonable electricity prices."[36] To illustrate, Peabody cites the U.S. average retail price for electricity in 2013—10.08 cents per kWh.[37] In comparison, Peabody proceeds, "[i]n 2014, Missouri's average *residential* retail price was 8.53 cents per kWh."[38] This confuses the issue and is both factually incorrect and misleading for a few reasons. First, 2014 has not yet concluded, and it is impossible to obtain the year's average residential retail price. Second, if Peabody meant to recite Missouri's December 2013 YTD residential price, that figure is still not 8.53 cents per kWh; it is 10.52 cents per kWh.[39] Third, if Peabody meant to reference the average Missouri retail 2013 YTD price across all sectors, that number is also not 8.53 cents per kWh—rather, it is 8.96 cents per kWh.[40] Peabody then favorably compares the average electricity rates in states with large coal fleets to those in states with small coal fleets.[41] Unfortunately, it is impossible to verify these figures given the lack of pinpoint citations and calculations provided by Peabody. Regardless, it is of little import, as Peabody's arguments are a red herring. It is not the average price of electricity that is the relevant comparison; rather, it is the average bill. On this front, although hourly electricity rates in California are high, "the average consumer in the state pays bills that are below the national average because overall electricity use is so low."[42]

Further muddying the waters, Peabody repeatedly cites the Chamber of Commerce for the proposition that the Clean Power Plan will wreak economic havoc throughout the country.[43] Peabody's glaring omission is that this report—issued *before* the Clean Power Plan existed—has been thoroughly and embarrassingly refuted.[44] Indeed, the Chamber of Commerce itself has stated that its analysis is wholly inapplicable to the Clean Power Plan as proposed.[45]

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[36] File No. EW-2012-0065, Dkt. No. 77 at 15.
[37] *Id*. at 15; U.S. Energy Information Administration, Electric Power Monthly (February 2014), Table 5.6.B.
[38] File No. EW-2012-0065, Dkt. No. 77 at 15 (emphasis added).
[39] U.S. Energy Information Administration, Electric Power Monthly (February 2014), Table 5.6.B.
[40] *Id.*
[41] File No. EW-2012-0065, Dkt. No. 77 at 15.
[42] Ralph Vartabedian, *U.S. electricity prices may be going up for good, L.A. Times* (Apr. 25, 2014), http://www.latimes.com/nation/la-na-power-prices-20140426-story.html.
[43] *See generally* File No. EW-2012-0065, Dkt. No. 77 at 10–15.
[44] *See* Laurie Johnson, *The Chamber is Wrong Again: Carbon Pollution Limits Will Lower Electricity Bills by Billions of Dollars, and Generate Hundreds of Thousands of Jobs, Not the Reverse, Natural Resources Defense Council Switchboard Blog* (May 28, 2014), http://switchboard.nrdc.org/blogs/ljohnson/the_chamber_is_wrong_again_car.html; *see also* Tom Reynolds, *Setting the Record Straight on the Chamber of Commerce's Report*, EPA Connect Blog (May 28, 2014), http://blog.epa.gov/epaconnect/2014/05/setting-the-record-straight-on-the-chamber-of-commerces-report/ ("[T]here are some major gaps in the numbers touted by the Chamber.); *see also* Steve Contorno, *Boehner: Obama's climate change policies*

In reality, EPA has provided a broad estimate of potential rate impacts in its modeling runs for different compliance scenarios. Exactly how EPA's proposed Clean Power Plan impacts rates will depend on several factors, including the measures Missouri includes in its plan, how that plan alters demand for electricity, and how those measures and policies affect infrastructure investment and power system operations. Given the flexibility that EPA has afforded to the states in its proposed Clean Power Plan, however, Sierra Club strongly believes that with a well-designed plan, the impacts on electricity rates from Missouri's $CO_2$-pollution control programs will be modest.[46] Moreover, those impacts will likely be offset by long-term benefits in the form of lower electricity bills and positive economic value to state and regional economies.

There are several reasons to be confident that customers can and will benefit from states' plans to lower the carbon intensity of their electric systems. First, states are well-equipped and have a long track record of using various regulatory and other policy tools to encourage utility investments that minimize the cost of electric service, consistent with the many public policies that affect the electricity sector. Second, as discussed, states will have the flexibility under the proposed Clean Power Plan to shape their implementation plans to best fit their circumstances, minimize costs of compliance, and provide benefits to customers. Third, states will have the opportunity to develop market-based mechanisms that offer unique opportunities to minimize costs while also reducing $CO_2$ emissions from existing power plants. Finally, and perhaps most

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*will kill 224,000 jobs and surge electric bills by billions*, Tampa Bay Times PolitiFact (June 2, 2014), http://www.politifact.com/truth-o-meter/statements/2014/jun/02/john-boehner/Boehner-says-Obama-climate-change-jobs-bills-costs/ ("The chamber itself told PolitiFact its estimates are not based on the goals as announced."); *see also* Glenn Kessler, *GOP lawmakers rush to cite study to discredit new EPA rule, but study assumed EPA rule would be tougher*, The Washington Post Fact Checker Blog (June 3, 2014), http://www.washingtonpost.com/blogs/fact-checker/wp/2014/06/03/gop-lawmakers-rush-to-cite-study-to-discredit-new-epa-rule-but-study-assumed-epa-rule-would-be-tougher/ ("[E]ven by the Chamber's admission, these numbers do not apply at all to the EPA rule as written"); *see also* Warren Fiske, *Gillespie says EPA carbon rules will kill 244,000 jobs a year and hike bills by $1,200*, Tampa Bay Times PolitiFact (June 9, 2014), http://www.politifact.com/virginia/statements/2014/jun/09/ed-gillespie/gillespie-says-epa-carbon-rules-will-kill-244000-j/ ("The chamber says its estimates do not apply to the goals as announced."); *see also* Steve Contorno, *Fact-checking Obama's rules on carbon and coal plants*, Tampa Bay Times PolitiFact (Aug. 14, 2014), http://www.politifact.com/truth-o-meter/article/2014/aug/14/fact-checks-obama-coal-rules-carbon-politics/ ("After the EPA released the rules the U.S. Chamber of Commerce told PolitiFact that its findings were no longer were [sic] applicable. But that didn't stop politicians from citing them.").

[45] *See id*.

[46] EPA has estimated that, by 2020, compliance costs for the Clean Power Plan will fall in a range of $4.3 billion to $7.5 billion in 2011$. For context, total expenditures on electricity in 2012 were $363.7 billion in 2012$. *See generally* Energy Information Administration (EIA) 861 database on electric revenues. For a thorough analysis of potential costs and strategies available for reducing costs to ratepayers and increasing benefits from compliance with the Clean Power Plan, *see* Paul Hibbard et al., EPA's Clean Power Plan: States' Tools for Reducing Costs and Increasing Benefits to Consumers (Analysis Group June 2014), *available at* http://www.analysisgroup.com/uploadedFiles/Publishing/Articles/Analysis_Group_EPA_Clean_Power_Plan_Report.pdf.

importantly, states are well equipped through long-standing utility ratemaking principles and practices to help protect low-income customers when electricity costs increase.

Sierra Club understands that Peabody's primary purpose involves the exploration, extraction, and distribution of coal—an inherently carbon-intensive business model. Peabody's muddying of facts and misleading attacks, however, are woefully out of place. Peabody cites to pre-proposal rhetoric—the discredited Chamber of Commerce report—despite the fact that there exists a thoroughly researched cost-benefit analysis available with the Clean Power Plan.[47] Providing deceptive information to an adjudicatory body like the Missouri Public Service Commission undermines the professionalism and integrity of the venue, and it insults the purpose of this docket. Carbon regulation is coming, and scare tactics, purposeful obfuscation, or willful ignorance all detract from reasoned debate. Still, despite our differences, there is one Peabody proposal with which we agree—the institution of proceedings to guide resource planning decisions.

Sierra Club has often stated that comprehensive, forward-looking planning is needed to protect ratepayers from risky, imprudent coal unit retrofit investments.[48] As stakeholders identify deficiencies in utility resource planning, we have advocated for the Commission to hold hearings and institute investigatory dockets to establish, correct, and provide accountability around the planning process.[49] Indeed, Sierra Club has, on a number of occasions, sought a hearing to address identified deficiencies in utility resource planning.[50] To date, the Commission has not granted these requests. Given the billions of dollars of ratepayer monies at issue, we urge the PSC to institute proceedings and hold hearings surrounding Missouri utilities' resource planning decisions. The revision of Rule 4 CSR 240-3.105 to incorporate environmental retrofits is a good start. To be meaningful, any process must include a full and fair opportunity for the Commission and stakeholders to compare a company's proposed investment to alternatives and seek a hearing on the merits of a company's proposal. We believe this structure would satisfy stakeholders with diverse interests, ranging from Sierra Club to the public to Peabody Energy.

## CONCLUSION

Sierra Club appreciates the opportunity to review the extensive stakeholder submissions and provide these responsive comments. Moving forward, we encourage the Commission to:

(1) Require utilities to completely catalog past and potential efficiency improvements at each EGU, providing at least the following:
    a. A thorough description of each improvement;

[47] *See generally* RIA.
[48] *See, e.g.*, File No. EW-2012-0065, Dkt. No. 78 at 10-14.
[49] *See* File No. EW-2012-0065, Dkt. No. 39 at 15.
[50] *See In the Matter of the Resource Plan of Kansas City Power & Light Company*, File No. EO-2012-0323, Dkt. No. 33, 43, 45; *In the Matter of the Resource Plan of KCP&L Greater Missouri Operations Company*, File No. EO-2012-0324, Dkt. No. 31, 33; *In the Matter of the Resource Plan of Kansas City Power & Light Company*, File No. EO-2013-0537, Dkt. No. 37, 42, 44, 46; and *In the Matter of the Resource Plan of KCP&L Greater Missouri Operations Company*, File No. EO-2013-0538, Dkt. No. 37, 43, 46, 48.

b. The anticipated and actual (if applicable) heat rate improvement achieved;
c. The anticipated degradation in performance of the project;
d. The cost of the project; and
e. The date it was undertaken.

(2) Hold hearings and institute investigatory dockets to establish, correct, and provide accountability around utilities' resource planning processes; and

(3) Complete the revision of Rule 4 CSR 240-3.105 to include environmental retrofits.

We look forward to further engagement with the Commission as the Clean Power Plan planning and implementation process unfolds.

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and sent by email on this 16th day of September, 2014, to all counsel of record.

/s/Henry Robertson
Henry Robertson