

STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION

At a session of the Public Service  
Commission held at its office  
in Jefferson City on the 1st  
day of December, 1993.

In the matter of Union Electric Company's electric )  
resource plan filed pursuant to 4 CSR 240-22. ) Case No. EO-94-118  
)

**ORDER GRANTING WAIVER OF CERTAIN FILING REQUIREMENTS  
ON LOAD FORECASTING AND DEMAND-SIDE RESOURCE ANALYSIS**

On October 8, 1993, Union Electric Company (UE) filed a Petition For Waiver Of Certain Filing Requirements On Load Forecasting And Demand-Side Resource Analysis (Petition) as required by the Commission's rules on electric resource planning set out in 4 CSR 240-22. This chapter of rules was adopted by Order of the Commission dated December 8, 1992, effective on May 6, 1993. The rules require UE to submit a filing on or about December 6, 1993, to demonstrate compliance with the resource planning requirements of Chapter 22. UE states that good cause exists for the Commission to grant a waiver as to certain filing requirements set out in 4 CSR 240-22.030 and 22.050. UE states that it has insufficient time to obtain all of the required information to comply with the December 6, 1993, deadline. UE believes that the lack of information will not significantly affect the value of UE's forecast, its demand-side analysis, the information required by other sections of Chapter 22, or UE's resource plan as a whole. UE requests a ruling on this Petition without a hearing.

On November 24, 1993, the Commission's Staff (Staff) filed its recommendation herein that the requested waiver be approved with certain reservations or qualifications. Staff has not requested a hearing and Public Counsel has not requested a hearing. Staff states that during informal workshops on the electric resource planning rules there was considerable concern over the extensive requirement of new information and new analyses that would impose an

undue burden on the electric utility companies. Staff views the waivers as intended to allow for a reasonable phase-in of the rule requirements. Staff states that the level of detail required of UE, especially as to the Load Analysis and Forecasting rule, 4 CSR 240-22.030, does in fact impose an undue burden on UE at this time to comply with the December 6, 1993, filing deadline. Staff believes that the requested waivers are reasonable and has set out specific recommendations as to each of UE's requested waivers.

The Commission, after considering the Petition filed by UE and Staff's recommendation, and without the necessity for hearing, determines that the requested waivers should be approved as qualified by Staff's recommendation. The Commission determines that granting the requested waivers would not unduly impede the electric utility resource planning process in that these are new rules and UE, as the first electric utility required to file under the rules, should be granted sufficient time in which to comply in its initial filing. The Commission has further considered Staff's requested qualifications and determines that these are reasonable requests and should be granted. The Commission, therefore, will approve the requested waivers as set out in UE's Petition subject to the qualifications requested by Staff.

**IT IS THEREFORE ORDERED:**

1. That the following waivers of certain requirements of the Commission's electric utility resource planning rules, 4 CSR 240-22, be granted to Union Electric Company subject to the qualifications as herein set out:

**Load Analysis and Forecasting (4 CSR 240-22.030)**

A. Paragraph (1)(B)1 - Historical data on monthly energy usage and number of customers by subclass

Union Electric Company is granted a waiver to allow the filing of annual rather than monthly historical data on kwh sales and number of

customers. However, in the future Union Electric Company should expand its historical data base to include monthly energy by subclass.

B. Subsection (1)(C) - Disaggregation of major class historical monthly energy usage and peak demand into number of units and use per unit components

Union Electric Company is granted a waiver to allow the filing of annual rather than monthly data for class kwh/unit and kw/unit at time of system peak. However, Union Electric Company should begin to build this data base on a monthly basis on a going-forward basis.

C. Paragraph (1)(C)1 - Typical units for each major class

Union Electric Company is granted a waiver from the use of typical units in the forecasts for the wholesale and street lighting classes.

D. Section (2) - Analysis of number of units

Union Electric Company is granted a waiver from the requirement to analyze the historical relationships between the number of units and the driver variables used to forecast those units for the industrial, interruptible, wholesale and street lighting classes.

E. Section (3) - Analysis of historical use per unit by end use

Union Electric Company is granted a waiver to allow it to provide an analysis of total usage for the industrial, interruptible, lighting and wholesale classes instead of an analysis of the end-use components of use per unit.

F. Paragraph (3)(A)2 - Schedule for acquiring end-use information or demonstration of infeasibility or lack of cost-effectiveness

With regard to four customer classes - industrial, interruptible, wholesale and street lighting - Union Electric Company is granted a waiver from the requirement to provide either a schedule for acquiring end-use information, or a demonstration that it would be infeasible or

not cost-effective to develop such information, with the provision that Union Electric Company will file its plan for assessing the feasibility and cost-effectiveness of developing this end-use information with the Commission no later than March 7, 1994.

G. Subsection (5)(B) - Separate forecasts of the number of units and use per unit for the wholesale, lighting and interruptible classes

(i) Union Electric Company is granted a waiver from the requirement to provide separate forecasts of the number of units and use per unit for the wholesale and lighting classes.

(ii) Union Electric Company is granted a waiver from the requirement to provide separate forecasts of the number of units and use per unit for the interruptible class.

H. Section (8) - Reporting requirements

Union Electric Company is granted a general waiver from the requirement to report information that will not be developed since the waivers requested in items A through G are hereby granted.

Demand-Side Resource Analysis (4 CSR 240-22.050)

A. Section (4) - Technical potential of end-use measures

Union Electric Company is granted a waiver from the requirement to estimate the technical potential of each demand-side measure that passes the measure-level cost-effectiveness screening test. Instead, Union Electric Company shall file an estimate of the combined technical potential of all measures within each end-use category. Such estimates will be provided for all demand-side programs that are screened for cost-effectiveness pursuant to the requirements of Section (7). However, as a general matter it is essential for Union

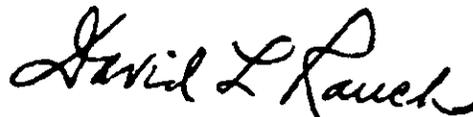
Electric Company to develop measure-specific estimates of technical potential.

B. Section (11) - Reporting requirements

Union Electric Company is granted a waiver from the requirement of Subsection (11)(C) to report the estimated technical potential of each cost-effective demand-side measure. Instead, Union Electric Company shall report the estimated technical potential, by end-use category, for each potential demand-side program as part of the information provided pursuant to Subsection (11)(H).

2. That this order shall become effective on the date hereof.

BY THE COMMISSION



David L. Rauch  
Executive Secretary

(S E A L)

Mueller, Chm., McClure, Perkins  
and Kincheloe, CC., concur.  
Crumpton, C., absent.