

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

In the Matter of an Investigation of Missouri	)	
Jurisdictional Generator Self-Commitments Into	)	Case No. EW-2019-0370
SPP and MISO Day-Ahead Energy Markets	)	

In the Matter of an Investigation of Missouri	)	
Jurisdictional Generator Self-Commitments into	)	Case No. EW-2020-0035
SPP and MISO Day-Ahead Energy Markets -	)	
The Empire District Electric Company	)	

1. Are the economic or unit minimums established based upon the physical limitations of each plant?

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2. Are the economic or unit minimums established based upon the optimization of operation of each plant?

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3. What factors are considered in the determination of the economic or unit minimums?

What weighting is applied to each factor in the determination of the economic or unit minimums?

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4. Do the economic or unit minimums ever vary for any reason other than the physical characteristics of the individual plant with the exception of unit testing? (i) With the exception of unit testing, explain each instance that the utility deems that this action is appropriate for purposes of bidding into each market. (a) What are the potential economic outcomes from such action? (b) Provide quantification of the benefits and detriments of each instance which the economic or unit minimum varies for reasons other than the physical characteristics of the individual plant. (c) How often is an analysis conducted regarding the economic outcome of variances from physical characteristics within the bidding strategy of the unit. (d) Who is responsible for determining the appropriateness of variances from physical characteristics within the bidding strategy of the unit?

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