BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Consideration of Adoption of the PURPA Section $111(d)(16)$ Consideration of Smart Grid Investments Standard as Required by Section 1307 of the Energy Independence and Security Act of 2007.))))	File No. EW-2009-0290
In the Matter of the Consideration of Adoption of the PURPA Section 111(d)(16) Integrated Resource Planning Standard as Required by Section 532 of the Energy Independence and Security Act of 2007.))))	File No. EW-2009-0291
In the Matter of the Consideration of Adoption of the PURPA Section 111(d)(17) Rate Design Modifications to Promote Energy Efficiency Investments Standard as Required by Section 532 of the Energy Independence and Security Act of 2007.))))	File No. EW-2009-0292
In the Matter of the Consideration of Adoption of the PURPA Section 111(d)(17) Smart Grid Information Standard as Required by Section 1307 of the Energy Independence and Security Act of 2007.))))	File No. EW-2009-0293

RESPONSE OF SOUTHWEST POWER POOL, INC. TO STAFF'S PROPOSAL

Comes now Southwest Power Pool, Inc. ("SPP") through its counsel and responds to Staff's Response to Order Setting Date for Filing Procedural Schedule and Request for Leave to Late-File ("Staff's Proposal"), filed on February 23, 2009, in response to the Missouri Public Service Commission's ("Commission's) February 11, 2009 Order Granting Leave To Late-File Proposal For Determining Procedural Schedules and Setting Deadlines For Proposals And Responses. SPP states as follows regarding these matters:

1. The Commission, in an Order issued December 17, 2008, directed the parties in four prior "EO" cases to jointly prepare and file proposed procedural schedules

for the purpose of considering the four Public Utility Regulatory Policies Act ("PURPA") electric standards in the Energy Independence and Security Act of 2007 ("EISA").

2. On February 2, 2009, the Commission convened a prehearing conference at which it was agreed that Staff would file its approach and procedural proposal(s) for the Commission to address the four PURPA electric standards and the other parties would subsequently file their responses.

3. On February 6, 2009, the Commission redesignated the four cases as "EW" cases for the purpose of considering the four PURPA electric standards in workshops.

4. On February 23, 2009, Staff filed Staff's Proposal.

5. Staff's Proposal recommended that the standards addressed by Case Nos. EW-2009-0290 and EW-2009-0293 be considered during the review of Chapter 22, the Electric Utility Resource Planning rule, 4 CSR § 240-22.010 et seq., for which the Staff plans the following schedule of three, two-day workshops: May 18-19, 2009; June 29-30, 2009 and late July or early August 2009. The goal is to submit a revised Chapter 22 to the Commission by mid to late September 2009 and place the matter on a Commission Agenda for Commission discussion. Staff's Proposal recommended, with respect to Case Nos. EW-2009-291 and EW-2009-0292, that the standards addressed therein be considered as falling under the prior state action exemption, having been considered in the context of the Commission's prior adoption of Chapter 22.

6. SPP believes Staff's Proposal to be a reasonable approach for the resolution and/or consideration of the four PURPA electric standards and has no reason to further comment on Staff's Proposal at this time.

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7. While SPP supports Staff's Proposal, it is aware that the proposal is subject to responses by the other parties in this case. SPP respectfully reserves the right to comment on the responses of the other parties.

Wherefore, SPP supports Staff's Proposal.

Respectfully submitted,

David C. Linton MoBar #32198 David C. Linton, L.L.C. 424 Summer Top Lane Fenton, Missouri 63026 (636) 349-9028 djlinton@charter.net

Attorney for Southwest Power Pool, Inc.

Dated: March 13, 2009

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Response of Southwest Power Pool, Inc. to Staff's Proposal was e-mailed on this 13th day of March, 2009, to the persons on the Commission's service list in this case.

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David C. Linton