

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

In the Matter of a Working Case to Explore)
Emerging Issues in Utility Regulation) File No. EW-2017-0245

**SOUTHWEST POWER POOL, INC.’S COMMENTS IN RESPONSE
TO THE COMMISSION’S QUESTIONS REGARDING
DISTRIBUTED ENERGY RESOURCE ISSUES**

COMES NOW, Southwest Power Pool, Inc. (“SPP”), by and through its counsel, and hereby submits its response to the opportunity to file Comments in response to the questions identified in the Public Service Commission of the State of Missouri’s (“Commission” or “MoPSC”) Order Seeking Responses Regarding Distributed Energy Resource (“DER”) Issues, and Scheduling Workshop Meeting (“Order”) issued on September 6, 2017.

SPP offers the following responses to certain Commission questions:

Question: What information about distributed energy resources do the Regional Transmission Organizations need?

Answer: SPP has not yet determined all of the information it may need regarding DERs to use in SPP’s planning processes. However, SPP plans to use the recently approved “Reliability Guideline – Distributed Energy Resource Modeling” issued by the North American Electric Reliability Corporation¹ as the starting point for discussions with SPP’s stakeholders for determining DER model data submission requirements to be used in SPP’s long-term transmission planning processes in the future.

Question: What information do the utilities have?

Answer: SPP is unaware of what information the utilities have regarding DERs. SPP plans to learn more about this as it works with its stakeholders going forward to develop appropriate DER model submission requirements for long-term transmission planning purposes.

¹ See http://www.nerc.com/comm/PC_Reliability_Guidelines_DL/Reliability_Guideline_-_DER_Modeling_Parameters_-_2017-08-18_-_FINAL.pdf.

Question: And what information are the utilities providing to the Regional Transmission Organizations?

Answer: SPP currently has no specific DER modeling data submission requirements. However, SPP is aware that some of SPP's stakeholders indirectly provide DER information by adjusting load forecast values to account for the presence of DERs on their systems (i.e., reducing load forecasts for periods of time that DERs are expected to operate). In the absence of specific DER modeling data submission requirements, SPP is not certain that there is a consistent approach being utilized among SPP stakeholders with DERs.

Respectfully submitted,

/s/ Mark W. Comley
Mark W. Comley #28847
NEWMAN, COMLEY & RUTH P.C.
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537
(573) 634-2266
(573) 636-3306 FAX
Email: comleym@ncrpc.com

and

Kandi N. Hughes, AR BIN 2010029
Tessie Kentner, AR BIN 2007240
Southwest Power Pool, Inc.
201 Worthen Drive
Little Rock, AR 72223
Telephone: (501) 482-2398
Email: khughes@spp.org

Attorneys for Southwest Power Pool, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was sent via e-mail on this 20th day of October, 2017, to the persons on the Commission's service list in this proceeding.

/s/ Mark W. Comley