

## ATTACHMENT A

### AMENERUE'S RESPONSE TO MISSOURI DEPARTMENT OF NATURAL RESOURCES' RESPONSE TO AMERENUE'S 2011 INTEGRATED RESOURCE PLAN WAIVER REQUESTS

#### *4 CSR 24022.030 – Load Analysis and Forecasting*

##### **(1) 4 CSR 240-22.030 (1)(D)1.**

DNR is not objecting.

##### **(2) 4 CSR 240-22.030 (1)(D)2.**

DNR is not objecting.

##### **(3) 4 CSR 240-22.030 (3)**

DNR's concerns about the analysis of end-use data for the large customer classes are unfounded. First, AmerenUE has used all relevant primary end-use data in the development of demand-side potential. Second, AmerenUE is unable to analyze historical end-use data if it does not exist. Unlike the residential and commercial general service classes, secondary data for the large customer classes is not applicable to the AmerenUE service territory. The lack of homogeneity between AmerenUE's large customers in relation to each other and the region indicate secondary data would not be a good proxy. In addition, economic data is the most applicable driver for large customer usage and AmerenUE is doing an analysis of use-per-unit as specified by section (2) of the load analysis and forecasting rules.

##### **(4) 4 CSR 240-22.030 (3)(B)1.**

DNR stated concern regards the collection of industrial end-use data. As described above AmerenUE does have and has used recent primary data from industrial customers. However AmerenUE cannot go back and collect data for historical years. AmerenUE was able to create a database of historical end-use data for some classes because there were secondary data sources that could approximate AmerenUE's customer base for those more homogeneous groups.

##### **(5) 4 CSR 240-22.030 (4)(A) and (6) 4 CSR 240-22.030 (4)(B)**

DNR again is concerned about industrial end-use data but in this case regarding the end-use load profiles. AmerenUE has hourly load shapes for each rate class and has developed end-use load shapes for classes of customers that are relatively homogeneous. However, the end-use load shapes were developed through a collaborative of utilities more than ten years ago and AmerenUE was not a participant. Furthermore, based on AmerenUE's knowledge no utility in the U.S. has conducted end-use load research since that time. Therefore, AmerenUE has already "diligently sought" information to develop load profiles.

#### ***4 CSR 24022.040 – Supply-Side Resource Analysis***

##### **(1) 4 CSR 240-22.040 (2)(B)2.**

DNR’s concern about the ability to provide input on the different levels of mitigation, in particular a varying Maximum Achievable Control Technology (MACT) is baseless. DNR is able and has been provided an avenue to give direct input or feedback at anytime during the resource planning process. Even if AmerenUE has not decided the varying levels of mitigation, DNR can submit any documentation they may have at any time. Furthermore, DNR’s concern about providing input at a time it can be used is contradictory to its own processes of providing input. In both AmerenUE’s and KCP&L’s latest IRPs, DNR has hired consultants to review the final filed IRPs rather than providing input during development. This is clearly within DNR rights but this type of review does not positively influence the outcome. It is also AmerenUE’s understanding that DNR is planning to again hire consultants to review AmerenUE’s IRP after the filing has been submitted.

##### **(2) 4 CSR 240-22.040 (3) and (3) 4 CSR 240-22.040 (6)**

DNR has stated concerns about the transmission interconnection cost allocation. DNR’s proposed revision is impossible given the data at this stage in the analysis is generic. The allocation of transmission interconnection costs is currently governed by an interim rate in MISO; therefore, AmerenUE is planning to include transmission interconnection cost allocation as a candidate independent uncertain factor. AmerenUE believes this is a superior method of incorporating transmission interconnection cost allocation and goes beyond what is included in the original waiver request.

#### ***4 CSR 24022.050 – Demand-Side Resource Analysis***

##### **(2) 4 CSR 240-22.050 (3)(F)**

AmerenUE’s original proposal agrees to provide an explanation for not including any cost-effective measures. In addition, AmerenUE has already “diligently sought” end-use measures to include in the screening analysis.

##### **(3) 4 CSR 240-22.050 (6)(D) and (4) 4 CSR 240-22.050 (9)**

AmerenUE’s original proposal agrees to provide the detailed delivery and evaluation strategy at the time of the appropriate proceeding before program implementation. That appropriate proceeding may be a tariff filing; however, with the rules for the Missouri Energy Efficiency Investment Act being developed a new proceeding may be more appropriate.

##### **(6) 4 CSR 240-22.050 (11)(J)**

DNR has proposed two additional reporting requirements. The first requirement will have already been met by including such items in the tariff filings. Since DNR is a participant in those proceedings there should be no need to burden the IRP. The second item is adequately covered by the original rule and therefore AmerenUE’s original proposal.

#### **4 CSR 24022.060 – Integrated Resource Analysis**

##### **(1) 4 CSR 240-22.060 (4)**

AmerenUE does not object to DNR’s proposed revision.

##### **(2) 4 CSR 240-22.060 (4)(C)**

DNR’s comments about this rule are centered on “rate structures” in the definition of energy-efficiency measure. AmerenUE’s believes this section is regarding the price responsiveness of load. DNR seems to have misinterpreted the purpose of this section. AmerenUE’s original proposal adequately accounts for the price responsiveness of load.

##### **(3) 4 CSR 240-22.060 (6)(A) and (4) 4 CSR 240-22.060 (6)(B)**

This waiver is to support the focus of effort on plans that pass the screening analysis. DNR seems to have missed the purpose of the waiver by inventing supplemental volumes that provide the same level of detail for plans that have been eliminated from further consideration. The purpose of the waiver was not only to provide the readers with less volume but also to alleviate the utility from the standardized reporting on screened plans. AmerenUE’s original waiver proposes to describe and indicate which plans are eliminated from further consideration on the basis of the screening analysis and shall explain the reasons for their elimination. Any additional details regarding the screened plans will be included with workpapers.

##### **(5) 4 CSR 240-22.060 (6)(C)**

DNR is requesting additional documentation that goes beyond the original rule requirements. AmerenUE believes DNR’s request is onerous given DNR’s access to workpapers. The reporting requirements should not be extended to offer multiple views of the same data depending on who wants to see it what way.

#### ***Other***

##### **(1) 4 CSR 240-22.040 (1)(K) - Commission Order in Case EO-2007-0409**

Although the rules do not explicitly say the Commission can waive a previous Commission order in regards to integrated resource planning AmerenUE believes the Commission can do so. Also as DNR notes tritium leaks have been in the headlines but AmerenUE does not conduct resource planning based on headlines. At this time AmerenUE is unaware of any proposed change in the regulation of tritium in the current planning horizon. As Sierra Club demonstrated it is possible to speculate regulation changes but from a practical standpoint there is no need for formal analysis.