

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

In the Matter of the Establishment of a Working Case            )  
For the Review and Consideration of Amending The            )        Case No. EW-2021-0165  
Commission’s Rule on Reporting Requirements For            )  
Electric Utilities and Rural Electric Cooperatives            )

**LIBERTY’S INITIAL COMMENTS**

**COMES NOW** The Empire District Electric Company (“Liberty” or the “Company”), and for its Initial Comments regarding the *Order Opening File Regarding Review of Reporting Requirements Rule and Providing Notice* issued herein on December 16, 2020, respectfully states as follows to the Missouri Public Service Commission (“Commission”):

The Staff of the Commission (“Staff”) “identified areas where improvements to the type and quality of information reported are warranted,” and Staff proposes amending the Commission’s Rule on Reporting Requirements for Electric Utilities and, as applicable, Rural Electric Cooperatives, found at 20 CSR 4240-3.190. Liberty appreciates the opportunity to provide comments regarding potential rule revisions. Staff’s 13 specific suggestions and Liberty’s comments regarding each are set forth below.

1. Require the provision of interval data by the utility on a monthly basis, and retention of interval data for retrieval and study.

Liberty is generally supportive of this potential rule revision. Additional information and guidance is needed, however, related to how data would be transmitted, due to its potential voluminous and confidential nature. In addition, Liberty would appreciate the opportunity to collaborate on developing the framework surrounding the frequency of the interval data being provided, along with how long such data would need to be retained.

2. Require the provision of hourly day-ahead cleared, real-time, and ancillary services at each generating unit.

Liberty is unclear what is meant by “hourly day-ahead cleared” and “real-time.” Additional clarification would be helpful to understand the nature of the request and the ability to assess the size and amount of time needed to gather the data. Further, additional guidance is needed on how the data is expected to be transferred and assurance that confidentiality can be maintained.

3. Require the provision of hourly day-ahead schedule and real-time load at load nodes.

Liberty is unclear what is meant by “hourly day-ahead schedule.” Additional clarification on what is being sought would be helpful in assessing the size and amount of time needed to gather the data. Further, additional guidance is needed on how the data is expected to be transferred and assurance that confidentiality can be maintained.

4. Require the consistent reporting of generation from PPAs as purchased power.

Additional information regarding the frequency of the generation requested (hourly, daily, etc.) and the reporting timeframes would be helpful. Liberty, however, generally supports this potential rule revision.

5. Require that format changes in reported data be accompanied by notification from the utility and an explanation of the changes made.

Liberty is generally supportive of this potential rule revision.

6. Require that password protection be removed from an electronic data file submitted to the Commission to meet these reporting requirements.

Liberty generally supports this potential rule revision. Liberty, however, would appreciate guidance related to how confidential data should be transmitted in a confidential/secure manner.

7. Require enhanced reporting of decisions to permanently retire power plants.

Liberty submits that monthly generation reports would not be the appropriate venue to report the planned retirement of power plants. Instead, a more formal process, such as the Integrated Resource Planning process or a general rate case proceeding, would allow for a more

appropriate and thorough discussion surrounding the decision-making process of retiring a power plant.

8. Require the reporting of unit heat rate curve data.

Liberty would like to better understand what sort of heat rate curve is requested. Heat rate curve data is supplied during a general rate proceeding in which a request to establish, continue, or maintain a Rate Adjustment Mechanism is made (20 CSR 4240-20.090(2)(A)15). It does not seem practical to require heat rate curve data on a monthly basis. Additionally, requesting monthly heat rate testing to refresh heat rate curves on a monthly basis does not seem practical.

9. Require the reporting of unit ramp rate data.

This data is supplied by Liberty to the SPP Integrated Marketplace on a daily basis and is not expected to change on a monthly basis. As such, Liberty would support a less frequent reporting requirement or a requirement that only requires reporting if changes are made from the previously reported ramp rates.

10. Require the reporting of unit variable operations and maintenance data.

Liberty needs further information regarding what is being requested for variable operations and maintenance data. This request seems overly broad, and further discussion is needed in respect to the desired goal of reporting the additional information.

11. Require the reporting of fuel price data used for dispatch of coal units, when the dispatch fuel price uses the market price of coal.

For Jointly Owned units registered as Multi Configuration Resources, the information to be reported will be limited and would need to be supplied by the Asset Owners.

12. Require reporting outages due to unforeseen occurrences.

Liberty requests additional clarification on what defines “unforeseen occurrences.” Unit outage information can become very granular, and a further explanation of what Staff is attempting to have reported would be helpful.

13. Require the use of an administratively controlled form maintained on the PSC public website for the reporting of accidents or events by electric utilities and rural electric cooperatives. Reporting via telephone, fax machine, email or EFIS notification will still be accepted.

Liberty is generally supportive of the further standardization of reporting accidents or events by electric utilities.

WHEREFORE, Liberty respectfully submits its Initial Comments regarding potential changes to Commission Rule 20 CSR 4240-3.190.

/s/ Diana C. Carter  
Diana C. Carter MBE #50527  
428 E. Capitol Ave., Suite 303  
Jefferson City, Missouri 65101  
Joplin Office Phone: (417) 626-5976  
Cell Phone: (573) 289-1961  
E-Mail: Diana.Carter@LibertyUtilities.com

### **CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed in EFIS on this 2<sup>nd</sup> day of March, 2021, with notice of the same sent to all counsel of record.

/s/ Diana C. Carter