

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

In the Matter of a Determination of Special)
Contemporary Resource Planning Issues to be)
Addressed by The Empire District Electric)
Company in its Next Triennial Compliance Filing)
or Next Annual Update Report.)

File No. EO-2012-0040

**STAFF'S SUGGESTED SPECIAL
CONTEMPORARY RESOURCE PLANNING ISSUES**

COMES NOW the Staff of the Missouri Public Service Commission and suggests the Commission include the following five issues in the list of special contemporary issues the Commission orders The Empire District Electric Company to analyze and document in its April 1, 2012 annual update report:

1. Aggressive regulations which allow aggregators of retail customers (ARCs) to market demand response services in Missouri.

Investigate and document the impacts on Empire's preferred resource plan and contingency plans of aggressive regulations by the FERC, regional transmission organizations (RTOs) and/or Missouri statutes/regulations to allow ARCs to operate and market demand response services in Missouri.

2. Aggressive renewable energy standard with no rate cap.

Investigate and document the impacts on Empire's preferred resource plan and contingency plans of a new much more aggressive renewable energy standard (*e.g.*, at least double the current standard for Missouri) with no rate cap.

3. Aggressive energy efficiency resource standard with no rate cap.

Investigate and document the impacts on Empire's preferred resource plan and contingency plans of a very aggressive energy efficiency resource standard (*e.g.*, annual energy savings of 1.5% each year for 20 years and annual demand savings of 1.0% each year for 20 years from electric utility demand-side programs) with no rate cap in Missouri.

4. Loss of significant load.

Investigate and document the impacts on Empire's preferred resource plan and contingency plans of a loss of significant load for the short term and potentially for the long term that may be the result of a prolonged double-dipped recession or a large customer or group of customers no longer taking service from Empire.

5. Aggressive environmental regulations.

Investigate and document the impacts of aggressive environmental regulations on Empire's preferred resource plan and contingency plans.

WHEREFORE, Staff recommends the Commission include the above listed issues in its order that contains the list of special contemporary issues which The Empire District Electric Company is to analyze and document in its April 1, 2012 annual update report.

Respectfully submitted,

/s/ Nathan Williams

Nathan Williams
Deputy Counsel
Missouri Bar No. 35512

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8702 (Telephone)
(573) 751-9285 (Fax)
nathan.williams@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or emailed to all counsel of record this 14th day of September 2011.

/s/ Nathan Williams