

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

In the Matter of the Determination of Special)	
Contemporary Resource Planning Issues to be)	
Addressed by The Empire District Electric)	<u>File No. EO-2019-0066</u>
Company in its Next Triennial Compliance)	
Filing or Next Annual Update Report)	

**STAFF SPECIAL CONTEMPORARY ISSUES FILING IN RESPONSE TO
COMMISSION ORDER OF SEPTEMBER 7, 2018 AND 4 CSR 240-22.080(4)(A)**

COMES NOW the Staff of the Missouri Public Service Commission in response to the Missouri Public Service Commission's September 7, 2018 *Order Opening a File Regarding Special Contemporary Resource Planning Issues and Offering an Opportunity to File Suggestions*. In support thereof, the Staff files its response and states as follows:

1. 4 CSR 240-22.080(4)(A) states: "No later than September 15, staff, public counsel, and parties to the last triennial compliance filing of each utility may file suggested special contemporary issues for each utility to consider."

2. 4 CSR 240-22.020(55) states:

Special contemporary issues means a written list of issues contained in a commission order with input from staff, public counsel, and intervenors that are evolving new issues, which may not otherwise have been addressed by the utility or are continuations of unresolved issues from the preceding triennial compliance filing or annual update filing. Each utility shall evaluate and incorporate special contemporary issues in its next triennial compliance filing or annual update filing.

3. The Staff requests that the Commission include the issues A, B, C, D and E set out below in the list of special contemporary resource planning issues which the Commission is to order by no later than November 1, 2018, that The Empire District Electric Company ("Empire") analyze and document in its triennial compliance filing to

be made with the Commission on April 1, 2019, pursuant to 4 CSR 240-22.080(1), (2), and (4):

- A. Document Empire's most recent economic analysis for its system-wide implementation of AMI meters. Provide projected implementation dates and annual budget for AMI implementation.
- B. When complying with 4 CSR 240-22.060(5)(M), include the following as uncertain factors that may be critical to the performance of alternative resource plans:
 - (i) Foreseeable demand response technologies, including but not limited to, integrated energy management control systems, linking smart thermostats, lighting controls and other load-control technologies with smart end-use devices;
 - (ii) Foreseeable energy storage technologies; and
 - (iii) Foreseeable distributed energy resources, including but not limited to, distributed solar generation, distributed wind generation, combined heat and power (CHP), and microgrid formation. Develop and provide a database of information on distributed generation (both utility owned and customer owned) and distributed energy storage (both utility owned and customer owned) for purposes of evaluating current penetration and planning for future increases in the levels of distributed generation and energy storage.
- C. When complying with 4 CSR 240-22.060(5)(A), analyze and document the impact of electric vehicle usage for the 20-year planning period upon the low-case, base-case and high-case load forecasts.
- D. Analyze and document the cost of any transmission grid upgrades or additions needed to address transmission grid reliability, stability, or voltage support impacts that could result from the retirement of any existing coal-fired generating unit in the time period established in the IRP process.
- E. Provide the most recent analysis of the costs and benefits of Empire's system-wide implementation of AMI meters. Provide projected implementation dates and annual budget for AMI implementation and – if Empire is performing integrated resource analysis - include the capital and operating cost impacts in the integrated resource analysis. If an analysis of AMI costs and benefits does not exist, please provide a detailed explanation of why it does not exist.

WHEREFORE the Staff requests that the Commission adopt the above list of special contemporary resource planning issues in its order(s) to be issued no later than November 1, 2018, that contains certain special contemporary resource planning issues

for Empire to analyze and document in its triennial compliance filing to be made with the Commission on April 1, 2019, pursuant to 4 CSR 240-22.080(1), (2) and (4).

Respectfully submitted,

/s/ Steven Dottheim

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 14th day of September, 2018.

/s/ Steven Dottheim