

**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 KCP&L Greater Missouri	)	<b><u>File No. EO-2014-0065</u></b>
Operations Company in its Next Triennial	)	
Compliance Filing or Next Annual Update	)	
Report	)	

**MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT -  
DIVISION OF ENERGY SUGGESTED SPECIAL CONTEMPORARY  
RESOURCE PLANNING ISSUES FOR KCP&L GREATER MISSOURI  
OPERATIONS COMPANY**

COMES NOW the Missouri Department of Economic Development –  
Division of Energy<sup>1</sup> (Division of Energy) pursuant to 4 CSR 240-22.080(4)  
and in response to the Missouri Public Service Commission’s (Commission)  
September 6, 2013, *Order Opening a File Regarding Special Contemporary  
Resource Planning Issues and Offering Parties an Opportunity to File  
Suggestions*, and provides its suggested special contemporary resource  
planning issues for KCP&L Greater Missouri Operations Company (GMO)  
for the Commission’s consideration.

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<sup>1</sup>The Division of Energy was transferred from the Department of Natural Resources (DNR) to the Department of Economic Development (DED) on August 29, 2013 by Executive Order 13-03. The Executive Order transfers “[A]ll authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development...” The Department of Natural Resources was made a party to this case in the Commission’s September 6 **Order** referenced above and the DED Division of Energy is its successor agency.

The Division of Energy appreciates this opportunity to provide input on contemporary issues. Suggested issues for GMO to address in its 2014 annual integrated resource plan update report are:

**Issue 1: Provide a more detailed analysis of distributed generation and combined heat and power (CHP) sources**

Analyze and document the impacts of opportunities to implement distributed generation, DSM programs and CHP projects in collaboration with municipal water treatment plants and other local waste or agricultural/industrial processes with on-site electrical and thermal load requirements, and large institutional customers, especially in targeted areas where there may be transmission or distribution line constraints.

**Issue 2: GMO should describe and document the legal and administrative steps necessary to allow for IRP planning on a combined company basis**

**Issue 3: GMO should describe and document its methodology for allocating combined company resources to its component companies**

In its annual update, GMO should describe and document its approach to constructing combined plans and its allocation procedures. If the Company uses a combined planning approach in the future, the combined plan should include an articulated methodology for sharing demand side, supply side and renewable resources between companies and demographic conditions.

#### **Issue 4: Customer Information/Behavior Modification DSM Programs**

Analyze and document alternative methods of customer information/behavior modification and education programs to increase customer awareness and encourage more efficient use of energy.

#### **Issue 5: Demand rate mechanisms**

Analyze and document the impact of opportunities to implement demand rate mechanisms and effects on the DSM portfolio in response to changing wholesale electricity prices. Analysis should consider implementation of such mechanisms compared to traditional real-time load forecasting and operational procedures.

Communications, correspondence, orders and decision in this matter should be addressed to:

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted  
electronically to all counsel of record this 13<sup>th</sup> day of September 2013.

/s/ Jeremy D. Knee  
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