

**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 Operations	)	<u>File No. EO-2016-0039</u>
Company in its Next Triennial Compliance	)	
Filing or Next Annual Update Report	)	

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

COMES NOW the Missouri Department of Economic Development – Division of Energy (“DE”)¹ pursuant to 4 CSR 240-22.080(4) and, in response to the Missouri Public Service Commission’s (“Commission”) August 20, 2015 *Order Opening a File Regarding Special Contemporary Resource Planning Issues and Offering an Opportunity to File Suggestions*, suggests the following special contemporary resource planning issues for KCP&L Greater Missouri Operations Company (“KCP&L-GMO” or “Company”):

1. Describe and document how the preferred plan of the Company’s last and current annual or triennial Integrated Resource Plans (“IRPs”) position the utility for full or partial compliance with the U.S. Environmental Protection Agency’s (“EPA”) Clean Power Plan (“CPP”) under Section 111(d) of the Clean Air Act, as released in final form on August 3, 2015. Please include in this regard:

a. An evaluation of how renewable energy, energy efficiency and other demand-side resources (including combined heat and power) deployed by the Company after January 1, 2013 could contribute to compliance;

¹ On August 29, 2013, Executive Order 13-03 transferred “all 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 . . . ”

- b. An evaluation of how renewable energy, and energy efficiency and other demand-side resources (including combined heat and power) deployed by the Company after the submission of a final State Implementation Plan could qualify under EPA’s proposed Clean Energy Investment Program (“CEIP”);
 - c. A description of additional investments (in fiscal, capacity, and energy terms by year) which will be required by the Company to meet the targets in the CPP under scenarios including: a statewide rate-based or mass-based emissions goal; a “trading-ready” approach; and participation in the CEIP;
 - d. The barriers to achieving these additional investments;
 - e. The price of carbon used by the Company in the analyses above; and,
 - f. An indication of the Company’s preferences regarding various compliance options under a state implementation plan.
2. Describe any assessments of the value of solar (“VOS”) performed or used by the Company specifically for its Missouri service territory.
3. Identify and evaluate the quantifiable non-energy benefits (“NEBs”) which could be included in the Company’s demand-side management portfolio planning process for the purposes of IRP planning. Such NEBs may include, but are not limited to, those considered during working docket EW-2015-0105 (*In the Matter of a Working Docket to Review the Commission’s Missouri Energy Efficiency Investment Act (MEEIA) Rules 4 CSR 240-3.163, 4 CSR 240-3.164, 4 CSR 240-20.093 and 4 CSR 240-20.094*) and as approved by the Commission for submission to the Secretary of State under EX-2016-0034 (*In the Matter of a Proposed Amendment, Rescission, and Consolidation of Commission Rules Relating to Demand-Side Programs*). Additionally, evaluate the impact of an NEB percentage “adder” as considered

during working docket EW-2015-0105 on the Company's demand-side management portfolio planning process for the purposes of IRP planning. Discuss the Company's preference for either a study to determine NEBs or the use of a NEBs percentage adder.

4. To the extent not already discussed in the Company's IRP filing, evaluate the potential load associated with electric vehicles within the Company's Missouri service territory and discuss how the preferred plan addresses the additional load requirements.

5. To the extent not already discussed in the Company's IRP filing, evaluate the need to modernize the utility's delivery infrastructure in order to ensure and enhance system resiliency, reliability and sustainability.

Communications, correspondence, orders and decision in this matter should be addressed to the undersigned with a copy to DEDEnergyCases@ded.mo.gov.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 15th day of September, 2015.

/s/ Alexander Antal

Alexander Antal