

**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	)	<b><u>File No. EO-2014-0063</u></b>
Triennial Compliance Filing or Next	)	
Annual Update Report	)	

**MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT -  
DIVISION OF ENERGY SUGGESTED SPECIAL CONTEMPORARY  
RESOURCE PLANNING ISSUES FOR THE EMPIRE DISTRICT  
ELECTRIC 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  
The Empire District Electric Company (Empire) 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 Empire to address in its 2014 annual integrated resource plan update report are:

**Issue 1: DSM, Combined Heat and Power (CHP) and Distributed Generation (DG)**

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: Adjusting its load forecast to reflect current economic conditions**

In its annual update, Empire should recalibrate its forecast of the number of households to reflect the existing economic situation. The analysis should describe and document any changes in the components of the load forecast made to account for changes in the economic situation and demographic conditions.

### **Issue 3: 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 4: 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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Energy**

**CERTIFICATE OF SERVICE**

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

/s/ Jeremy D. Knee  
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