

**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-2020-0045</u>
Company in Its Next Triennial Compliance)	
Filing or Next Annual Update Report)	

**STAFF SPECIAL CONTEMPORARY ISSUES FILING IN RESPONSE TO
COMMISSION ORDER OF AUGUST 23, 2019 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 August 23, 2019, *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. 20 CSR 4240-22.080(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. 20 CSR 4240-22.020(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, and C set out below in the list of special contemporary resource planning issues which the Commission is to order by no later than November 1, 2019, that KCP&L Greater Missouri Operations Company ("GMO") analyze and document in its annual update filing to be

made with the Commission in March 2020,¹ pursuant to 20 CSR 4240-22.080(1), (3) and (4):

- A. When complying with 20 CSR 4240-22.060(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.
- B. When complying with 20 CSR 4240-22.060(5)(A), analyze and document the impact of electric vehicle adoption and charging station installations for the 20-year planning period upon the low-case, base-case and high-case load forecasts.
- C. 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.

4. Staff notes that on August 23, 2019, Staff filed its *Staff Report (Public and Highly Confidential)* in File No. EW-2019-0370 In the Matter of an Investigation of Missouri Jurisdictional Generator Self-Commitments into SPP and MISO Day-Ahead Markets.

¹ 20 CSR 4240-22.080(3)(B) states in part that on or about April 1 of every year in which the electric utility is not required to submit a triennial compliance filing, each electric utility shall host an annual update workshop with the stakeholder group. The annual update report is to be filed with the Commission by the electric utility no less than twenty (20) days before the annual update workshop. 20 CSR 4240-22.080(3)(C) addresses filings after the annual update workshop.

Staff has additional questions in that docket in regards to “economic minimum” and/or “unit minimum” and intends to obtain more information from the utilities on these matters. The responses from the utilities to those questions may result in Staff having additional questions for the utilities or suggestions for the utilities’ respecting their IRP filings, but any such recommendations will be made in the context of File No. EW-2019-0370.

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, 2019, that contains the list of special contemporary resource planning issues for GMO to analyze and document in its annual update filing to be made with the Commission in March 2020, pursuant to 20 CSR 4240-22.080(1), (3) 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 16th day of September, 2019.

/s/ Steven Dottheim

