

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of a Determination of Special	)	
Contemporary Resource Planning Issues to be	)	File No. EO-2015-0040
Addressed by Kansas City Power & Light	)	
Company in its Next Triennial Compliance Filing	)	
or Next Annual Update Report	)	

**LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES OF SIERRA CLUB**

Pursuant to 4 CSR 240-22.080(4), Sierra Club hereby recommends the following as special contemporary issues for consideration and analysis by Kansas City Power & Light (“KCP&L”). Many of the below issues were also identified by Sierra Club in its comments on KCP&L’s most recent integrated resource planning update docket, EO-2014-0256. Sierra Club filed comments in that docket on May 21, 2014 (Docket No. 14) and reply comments on July 9, 2014 (Docket No. 18) and incorporates those comments herein by reference. Prudent utility planning also calls for KCP&L to continue evaluating these issues, on the basis of up-to-date information, in its annual update reports and triennial compliance filings.

1. Developing and documenting for use in all economic modeling and resource planning low, base, and high projections for natural gas prices, CO2 prices, and coal prices;
2. The prospects for the future price of electricity in the wholesale market, and the impact of any changes in wholesale market prices on KCP&L’s ability to generate revenue through off-system sales;
3. Analyzing and documenting low, base, and high scenarios of projected off-system sales revenues under a range of assumed natural gas prices, CO2 prices, and coal prices;

4. Analyzing and documenting the future capital and operating costs faced by each KCP&L coal-fired generating unit in order to comply with all existing, pending, or potential environmental standards, including:
  - a. Clean Air Act New Source Review provisions;
  - b. 1-hour Sulfur Dioxide National Ambient Air Quality Standard;
  - c. National Ambient Air Quality Standards for ozone and fine particulate matter;
  - d. Cross-State Air Pollution Rule, in the event that the rule is reinstated;
  - e. Clean Air Interstate Rule;
  - f. Mercury and Air Toxics Standards;
  - g. Clean Water Act Section 316(b) Cooling Water Intake Standards;
  - h. Clean Water Act Steam Electric Effluent Limitation Guidelines;
  - i. Coal Combustion Waste rules;
  - j. Clean Air Act Section 111(d) Greenhouse Gas standards for existing sources;
  - k. Clean Air Act Regional Haze requirements.
5. Analyzing and documenting 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 KCP&L coal-fired generating unit;
6. Analyzing and documenting on a unit-by-unit basis the net present value revenue requirement of the relative economics of continuing to operate each KCP&L coal-fired generating unit versus retiring and replacing each such unit in light of all of the environmental, capital, fuel, and O&M expenses needed to keep each such unit operating as compared to the cost of other demand side and supply side resources;

7. Analyzing and documenting how participation in Southwest Power Pool markets has affected KCP&L's revenue requirements;
8. Analyzing and documenting the technical, maximum achievable, and realistic achievable energy and demand savings from demand side management, and incorporating each level of savings into KCP&L resource planning process;
9. Analyzing and documenting the levels of achievable combined heat and power and incorporating such achievable CHP into KCP&L's evaluation of demand side management;
10. Analyzing and documenting cost and performance information sufficient to fairly analyze and compare utility-scale wind and solar resources to other supply-side alternatives;
11. Analyzing the impact of emerging energy efficiency technologies throughout the planning period;
12. Analyzing and documenting the long-term rate and bill impacts of any alternative demand-side management plan evaluated by the company; and
13. Explaining whether and to what extent KCP&L and GMO operate as a single entity for resource planning and operational purposes.

Date: September 15, 2014

Respectfully submitted,

/s/ Henry Robertson  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS  
and sent by email on this 15th day of September, 2014, to all counsel of record.

/s/ Henry Robertson  
Henry Robertson