

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Establishment of a Working Case)
For the Review and Consideration of Amending) **File No. EW-2021-XXXX**
The Commission’s Rule on Reporting Requirements)
For Electric Utilities and Rural Electric Cooperatives)

STAFF MOTION TO ESTABLISH WORKING CASE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through Staff Counsel’s Office, and moves the Commission to establish a working case for a review and consideration of amending the Commission’s Rule on Reporting Requirements for Electric Utilities and Rural Electric Cooperatives, found at 20 CSR 4240-3.190.

In support of its motion Staff states as follows:

1. Staff has identified areas where improvements to the type and quality of information reported are warranted in the Commission’s Rule on Reporting Requirements for Electric Utilities and Rural Electric Cooperatives. Below is a description of the issues Staff has identified, followed by Staff’s proposed solution:

A. Issue: This particular Commission reporting rule was last substantively amended effective August 2010, and since that time, there have been significant changes in energy market operations, metering technology, and coal plant retirements. The recent COVID-19 pandemic has further highlighted the need for clarity and consistency in utility-reported information.

B. Proposed Solution: Amend¹ the Commission's Rule on Reporting Requirements for Electric Utilities and, as applicable, Rural Electric Cooperatives, found at 20 CSR 4240-3.190,² to:

1. Require the provision of interval data by the utility on a monthly basis, and retention of interval data for retrieval and study.
2. Require the provision of hourly day-ahead cleared, real-time, and ancillary services at each generating unit.
3. Require the provision of hourly day-ahead schedule and real-time load at load nodes.
4. Require the consistent reporting of generation from PPAs as purchased power.
5. Require that format changes in reported data be accompanied by notification from the utility and an explanation of the changes made.
6. Require that password protection be removed from any electronic data file submitted to the Commission to meet these reporting requirements.
7. Require enhanced reporting of decisions to permanently retire power plants.
8. Require the reporting of unit heat rate curve data.
9. Require the reporting of unit ramp rate data.
10. Require the reporting of unit variable operations and maintenance data.
11. Require the reporting of fuel price data used for dispatch of coal units, when the dispatch fuel price uses the market price of coal.
12. Require reporting of outages due to unforeseen occurrences.

¹ Staff is cognizant that any amendment would need to be consistent with Section 394.160, RSMo. and any information contained in the reports filed pursuant to this rule would still be subject to the provisions of Section 386.480, RSMo.

² As Staff proceeds through the working docket process, it may be determined that a new rule or a move to another chapter of the Commission's rules is more appropriate for the reporting requirements.

13. Require the use of an administratively controlled form maintained on the PSC public website for the reporting of accidents or events by electric utilities and rural electric cooperatives. Reporting via telephone, fax machine, email, or EFIS notification will still be accepted.

2. Staff's intent with this proposal to amend 20 CSR 4240-3.190 is to update the existing reporting requirements for technology and market advancements while also improving the information reported and providing additional useable information to Staff.

3. Staff has not drafted an amended Rule at this time because Staff believes it would be appropriate to first receive comments from interested stakeholders in the course of a Commission-overseen working group docket prior to drafting the amended Rule. Staff has, however, set forth its areas of concern with the current Rule as well as a proposed solution above. Therefore, Staff requests that the Commission issue an order requesting that comments be filed within 30 days after the date of the Commission's Order establishing a working case in this docket seeking comments on the issues and potential solution identified herein by Staff, as well as any additional issues with the current Rule, along with potential solutions, identified by the commenters. After the comment due date Staff will draft an amended Rule and schedule workshop(s) with interested stakeholders as it may deem necessary.

4. Staff further requests that the Commission serve its Order Establishing Working Case on all counsel of record for electrical corporations regulated by the Commission, the Office of the Public Counsel, all intervenors in the most recent general rate cases of those electrical corporations, and to the Association of Missouri Electric Cooperatives ("AMEC").

WHEREFORE, Staff moves the Commission to open a working case and issue an Order requesting comments within 30 days after the date of said Order addressing the consideration of the amendment of the Commission's Rule on Reporting Requirements for Electric Utilities and, as applicable, Rural Electric Cooperatives, found at 20 CSR 4240-3.190.

Respectfully submitted,

/s/ Jamie S. Myers

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 9th day of December, 2020.

/s/ Jamie S. Myers