

**BEFORE THE PUBLICSERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Establishment of a Working)
Case Regarding the Membership of Missouri's) **File No. EW-2021-0104**
Investor-Owned Electric Utilities in Regional)
Transmission Organizations)

MOTION FOR COMMISSION ORDER

COMES NOW the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its Motion For Commission Order states:

1. On October 14, 2020, the Commission issued its Order Opening A Working Case To Consider The Membership Of Missouri's Investor-Owned Electric Utilities In Regional Transmission Organization, opening a workshop to gather information to determine whether continued membership in an RTO is in the ratepayers' best interest. In particular, the Commission wanted examination of "the benefits of RTO membership, the monetized value of those benefits, and what time horizons should be employed to compare asset lives (costs) to the values of benefits streams." Furthermore, in its order, the Commission directed:

each Missouri investor-owned electric utility to take part in a workshop to determine 1) the kind of information needed to respond to the Commission's current and previous orders on RTO membership; 2) whether such information is reasonably and economically available, and if not, what kind of information could be used as a proxy to control costs and expeditiously respond to the Commission; 3) the cost of gathering, analyzing, and interpreting such information; and 4) whether there are any identifiable "deal breaker" events or categories of events that would make it unreasonable for a Missouri investor-owned utility to remain in an RTO.

2. In light of the above directive, and to better help facilitate Staff's investigation, a list of questions has been prepared for Missouri investor owned electric utilities to answer. This list is attached as Appendix A.

3. Pursuant to Sections 386.250(6)-(7), 386.310, 393.140 (2016), RSMo the Staff requests that the Commission issue an Order requiring Union Electric Company d/b/a Ameren Missouri; Evergy Metro, Inc. d/b/a Evergy Missouri Metro; Evergy Missouri West, Inc. d/b/a Evergy Missouri West; and The Empire District Electric Company d/b/a Liberty to file a response in this docket to the questions presented in Appendix A no later than February 15, 2021.

4. Staff also believes input from additional stakeholders would be helpful and has included specific questions for those potential stakeholders. Staff welcomes responsive comments from any additional stakeholders interested in the subject matter.

WHEREFORE, Staff prays the Commission issues an order directing the listed utilities to respond to the questions in Appendix A no later than February 15, 2020.

Respectfully submitted,

/s/ Nicole Mers

Nicole Mers
Deputy Counsel
Missouri Bar No. 66766
P.O. Box 360
Jefferson City, MO 65012
(573) 751-6651 (Telephone)
(573) 751-9285 (Fax)
Nicole.mers@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all parties and/or counsel of record on this 18th day of December, 2020.

/s/ Nicole Mers

Appendix A

Questions for Utilities

RTO Benefits

- (1) For your utility, please identify and describe all direct and indirect benefits that your utility receives from RTO participation.
- (2) For each benefit, please identify the time period over which the utility expects to accrue those benefits. Additionally, please give the utility's best approximation of when each benefit will be experienced. If that benefit is expected to increase or decrease annually over time, please explain what changes would cause the benefit to change.
- (3) For each benefit, please identify whether or not this benefit can be quantified.
 - a. Can the quantifiable benefits be measured or valued over a certain timeframe?
 - b. Please identify any discount rates used for measuring future benefits or likelihoods if scenario planning is involved.
- (4) For each quantifiable benefit, has the utility quantified those benefits since the utility began participation in the RTO? Why or why not? Additionally, please explain how the utility has quantified those benefits, provide any/all workpapers that calculated these benefits, and provide the cost of gathering, analyzing, and interpreting such information.
 - a. Have any measurable benefits factored into the utility's business plan or performance metrics?
- (5) Please identify how the utility would ideally quantify future benefits of RTO participation. Please provide the cost of gathering, analyzing, and interpreting such information under the ideal scenario. If such information is not reasonably and economically available, what kind of information would the utility propose as a proxy? Please provide the cost of gathering, analyzing, and interpreting such proxy information.
 - i. What will drive these future benefits?
 - ii. Are there any existing benefits that will be eliminated based on upcoming or expected changes at the RTO?
- (6) For each benefit of RTO participation that is not quantifiable, please explain why it is not quantifiable.
- (7) For each non-quantifiable benefit, has your utility placed a monetary value on the benefit? If so, please explain how the monetary value was derived, and provide the cost of gathering, analyzing, and interpreting such information.
- (8) Does your utility receive an adder from FERC for any of its RTO participation? What is the monetary value of those adders?
- (9) How many FTE are there in your utility whose positions solely or mostly involve working with or monitoring or reporting data to the RTO? What is the cost of those positions or the parts that deal only with the RTO? What is the overall ancillary support

budget to maintain these positions? Do you expect the number of employees and the budget in this area to increase over time? Why?

- a. Please estimate how the employment needs would change absent RTO membership.

RTO Costs

- (1) For your utility, please identify and describe all costs that your utility incurs from RTO participation.
- (2) For each cost, please identify the time period over which the utility expects to incur those costs. Additionally, please give the utility's best approximation of when each cost will be experienced. If that cost is expected to increase or decrease annually over time, please explain what changes would cause the cost to change.
- (3) For each cost, please identify whether or not this cost can be quantified.
- (4) For each quantifiable cost, has the utility quantified those costs since the utility began participation in the RTO? Why or why not? Additionally, please explain how the utility has quantified those costs, provide any/all workpapers that calculated these cost, and provide the cost of gathering, analyzing, and interpreting such information.
- (5) Please identify how the utility would ideally quantify future costs of RTO participation. Please provide the cost of gathering, analyzing, and interpreting such information under the ideal scenario. If such information is not reasonably and economically available, what kind of information would the utility propose as a proxy? Please provide the cost of gathering, analyzing, and interpreting such proxy information.
 - i. What will drive these future costs?
 - ii. Are there any existing costs that will be eliminated based on upcoming or expected changes at the RTO?
- (6) For each cost of RTO participation that is not quantifiable, please explain why it is not quantifiable.
- (7) For each non-quantifiable cost, has your utility placed a monetary value on the cost? If so, please explain how the monetary value was derived, and provide the cost of gathering, analyzing, and interpreting such information. - What have been the total cost of the RTO overheads allocated to the utility the past 3 years on an annual basis? What specific benefits are provided for those costs?
- (8) What would be the cost of exiting an RTO? Are offsets to these costs possible? Please provide in graph form if possible from the date your company entered the RTO and the date at which the RTO mandated an exit fee (if these dates are not the same please explain) on a yearly basis the cost of what an exit fee would have been if your company had exited the RTO versus what the estimated benefits received were for those same years.

RTO Benefit-Cost Study Period

As of now, when would your utility anticipate conditions being favorable to performing a benefit cost study? What would the time period be for that analysis? Please explain what changes to current conditions result in that period being selected. Additionally, are there identifiable events or categories of events that would result in that period being moved forward or back? Please identify and explain.

Is there value in the Commission maintaining the conditions in prior orders for utilities to provide benefit-cost studies? What if anything do other states in which a utility or its affiliates operate require for a comparable review?

Question for all Stakeholders

RTO Withdraw Events

Are there any identifiable “deal breaker” events or categories of events that would make it unreasonable for a Missouri investor-owned utility to remain in their current RTO? If so, please identify the event or category of events. Please provide a recommendation for how to analyze the costs and benefits for each event or category of events.