

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-2019-0066
Addressed by Empire District Electric Co.)	
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 Empire District Electric.

1. Analyze and screen electric vehicle charging infrastructure as a candidate resource option in light of the Court of Appeals Western District’s decision in *KCP&L v. PSC*, No. WD80911 (Aug. 7, 2018), that such an investment may be recoverable in rate base.
2. Analyze, document and screen renewable energy + battery storage as an alternative to existing coal-fired generation, comparable to Xcel Energy’s proposed Colorado Clean Energy Plan in Colorado PUC docket No. 16A-0396E.
3. 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;
4. The prospects for the future price of electricity in the wholesale market, and the impact of any changes in wholesale market prices on Ameren’s ability to generate revenue through off-system sales;
5. 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;

6. Analyzing and documenting the future capital and operating costs faced by each Ameren coal-fired generating unit in order to comply with all existing, pending, or potential environmental standards, including, until they have been finally withdrawn or replaced:
 - 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.
7. 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 Ameren coal-fired generating unit;
8. Analyzing and documenting the criteria by which units are assigned various operational designations (e.g., “must run”) for use in all Company economic modeling and resource planning;
9. Analyzing and documenting on a unit-by-unit basis the net present value revenue requirement of the relative economics of continuing to operate each Ameren 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;

10. 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 Ameren resource planning process;
11. Analyzing and documenting the levels of achievable combined heat and power and incorporating such achievable CHP into Ameren's evaluation of demand side management; and
12. Analyzing and documenting cost and performance information sufficient to fairly analyze and compare utility-scale wind and solar resources to other supply-side alternatives.

Respectfully submitted,

/s/ Henry Robertson

Henry B. Robertson
Great Rivers Environmental Law Center
319 N. Fourth St., Ste. 800
St. Louis, MO 63102
(314) 231-4181
hrobertson@greatriverslaw.org

Attorney for Sierra Club

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 14th day of September, 2018, to all counsel of record.

/s/ Henry Robertson

Henry Robertson