

**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 The Empire District Electric)	<u>File No. EO-2017-0076</u>
Company In its Next Triennial Compliance)	
Filing or Next Annual Update Report)	

**STAFF’S SUGGESTED SPECIAL CONTEMPORARY RESOURCE
PLANNING ISSUES FOR THE EMPIRE DISTRICT ELECTRIC COMPANY**

COMES NOW the Staff of the Missouri Public Service Commission (“Commission”), by and through counsel, and, pursuant to 4 CSR 240-22.080(4), and for its response to the Commission’s September 9, 2016 *Order Opening A File Regarding Special Contemporary Resource Planning Issues And Offering An Opportunity To File Suggestions*, requests the Commission include the issues indicated below in the list of special contemporary resource planning issues the Commission orders The Empire District Electric Company (“Empire”) to analyze and document in Empire’s annual update filing to be filed with the Commission on April 1, 2017, pursuant to 4 CSR 240-22.080(1)(A), 22.080(3) and 22.080(4).

1. Commission Rule 4 CSR 240-22.010(2) states, in part, that the “fundamental objective of the resource planning process at electric utilities shall be to provide the public with energy services that are safe, reliable, and efficient, at just and reasonable rates, in compliance with all legal mandates, and in a manner that serves the public interest and is consistent with state energy and environmental policies.” With this rule in mind, the Staff proposes the following special contemporary resource planning issues for Empire.

2. The Staff's suggested special contemporary issues for Empire's 2017 annual update report are as follows:

- A. Document Empire's most recent economic analysis for its system-wide implementation of AMI meters. Provide projected implementation dates and annual budget for AMI implementation.
- B. Analyze and document the future capital and operating costs faced by each Empire coal-fired generating unit in order to comply with the following environmental standards:
 - (1) Clean Air Act New Source Review provisions;
 - (2) 1-hour Sulfur Dioxide National Ambient Air Quality Standard;
 - (3) National Ambient Air Quality Standards for ozone and fine particulate matter;
 - (4) Cross-State Air Pollution Rule, in the event that the rule is reinstated;
 - (5) Mercury and Air Toxics Standards;
 - (6) Clean Water Act Section 316(b) Cooling Water Intake Standards;
 - (7) Clean Water Act Steam Electric Effluent Limitation Guidelines;
 - (8) Coal Combustion Waste rules;
 - (9) Clean Air Act Section 111(d) Greenhouse Gas standards for existing sources;
 - (10) Clean Air Act Regional Haze requirements; and
 - (11) Clean Power Plan.
- 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 Empire coal-fired generating unit in the time period established in the IRP process.
- D. Review the options available to Empire for providing customer financing for energy efficiency measures. Discuss Empire's current, near term (next three years) and long term activities and plans for providing customer financing for energy efficiency measures.

WHEREFORE, the Staff recommends the Commission adopt the above listed special contemporary resource planning issues in its order that contains the list of special contemporary resource planning issues for Empire to analyze and document in its April 1, 2017 annual update report filing, pursuant to 4 CSR 240-22.080(1)(A), 22.080(3) and 22.080(4).

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin
Deputy Staff Counsel
Missouri Bar No. 51709
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 526-7779 (Telephone)
(573) 751-9285 (Fax)
bob.berlin@psc.mo.gov (e-mail)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered or transmitted by facsimile or electronic mail to all counsel of record this 15th day of September, 2016.

/s/ Robert S. Berlin