M E M O R A N D U M

TO: Missouri Public Service Commission Official Case File
File No. EX-2014-0205
Dogwood Energy, LLC's Petition for Revision of Commission Rule
4 CSR 240-3.105

FROM: John Rogers, Utility Regulatory Manager

DATE: /s/Natelle Dietrich 02/14/2014 /s/Steve Dottheim 02/14/2014
Director of Tariff, Safety, Economic & Engineering Analysis / Date
Staff Counsel Division / Date

SUBJECT: Staff Review Of Certain Assertions Made By Dogwood Energy, LLC In Its Rulemaking Petition Regarding Prior Commission Proceedings

DATE: February 14, 2014

On January 8, 2014, Dogwood Energy, LLC, ("Dogwood") filed its *Rulemaking Petition* ("Petition") in File No. EX-2014-0205 requesting that the Missouri Public Service Commission ("Commission") commence rulemaking proceedings to fully consider and approve an amendment of 4 CSR 240-3.105. The Petition includes Dogwood's suggested amendment to 4 CSR 240-3.105 to clarify that Missouri Public Service Commission ("Commission") approval is required for any new electric plant that is to be included in rate base for purposes of setting Missouri electric rates including: a) plant acquired from others, b) renovation of existing plant, and c) plant located in another state. Additionally, Dogwood's proposed amendment would make clear that electric utilities must fully consider alternatives identified by means of competitive bidding and provide sufficient information to the Commission so that the Commission can evaluate a request for approval [of new electric plant] in the context of such alternatives [identified through competitive bidding], and even provide for the Commission appointing a monitor to evaluate such costs prior to ruling on an application for a certificate of convenience and necessity.

In its Petition, Dogwood uses information from several of The Empire District Electric Company's ("Empire") recent Chapter 22 Electric Utility Resource Planning dockets and a

NP

Attachment A

Commission workshop docket[1] to illustrate how Dogwood has allegedly been disadvantaged and how Empire has committed itself to its Riverton 12 conversion project:

a) Without first issuing a request for proposal ("RFP") to obtain sufficient cost information regarding its supply alternative;
b) Without an open-minded and full analysis of the proposal that Dogwood submitted on its own;
c) Without due regard for an apparent $107,500,000 in up-front capital cost savings and related ratepayer benefits that would result from buying a fractional interest in the Dogwood Energy Facility of 100 MW rather than converting Riverton 12; and
d) Without due regard for the opportunity to accelerate retirement of other generation units in connection with a prompt acquisition of an interest in the Dogwood Energy Facility.[2]

In this memorandum the Commission Staff ("Staff") discusses the above assertions made by Dogwood in its Petition in light of the Commission's Chapter 22 Electric Utility Resource Planning Rules and several of the Commission's recent decisions. As a result of its limited review of the assertions made by Dogwood in the Petition, Staff concludes that Dogwood's assertions addressed below are not well-founded and should not be considered to be justification – in and of themselves – for going forward with a rulemaking proceeding although Staff's recommendation in general is for the Commission to proceed with the proposed rulemaking.

Chapter 22 Electric Utility Resource Planning Rules do not require that an electric utility obtain competitive bids through an RFP as part of supply-side resource analysis.

Empire's original decision to invest in the Riverton 12 conversion project was made by Empire in its 2010 Chapter 22 triennial compliance filing under the Commission's original Chapter 22 rules.[3] Rule 4 CSR 240-22.040 establishes minimum standards for the scope and level of detail required in supply-side resource analysis. Rule 4 CSR 240-22.040(1) requires that:

[1] Dogwood references the following Empire Chapter 22 dockets and a Commission workshop docket: 2010 Chapter 22 Triennial Compliance Filing in File No. EO-2011-0066, 2012 Chapter 22 Annual Update in File No. EO-2012-0294, Investigation of the Cost to Missouri's Electric Utilities Resulting from Compliance with Federal Environmental Regulations in File No. EW-2012-0065, and 2013 Chapter 22 Triennial Compliance Filing in File No. EO-2013-0547.
[2] See pages 7 – 8 of *Dogwood Rulemaking Petition* in File No. EX-2014-0205.
[3] The Commission's original Chapter 22 Rules were effective March 29, 1993 through June 29, 2011. The Commission's revised Chapter 22 Rules have an effective date of June 30, 2011.

> The analysis of supply-side resources shall begin with the *identification of a variety of potential supply-side resource options which the utility can reasonably expect to develop and implement solely through its own resources or for which it will be a major participant*. These options include new plants using existing generation technologies; new plants using new generation technologies; life extension and refurbishment at existing generating plants; enhancement of the emission controls at existing or new generating plants; purchased power from utility sources, cogenerators or independent power producers; efficiency improvements which reduce the utility's own use of energy; and upgrading of transmission and distribution systems to reduce power and energy losses. The utility shall collect *generic cost and performance information for each of these potential resource options* which shall include the following attributes where applicable: … [Emphasis added.]

While Empire could have identified the Dogwood Energy Facility as a potential supply-side resource to screen as part of its supply-side resource analysis, Empire is not required to do so and did not. Further, the Commission's Chapter 22 Rules do not require that an electric utility issue an RFP to obtain cost information for the utility's supply-side alternatives. Rather, "generic costs and performance information" for each potential [supply-side] resource option are all that is required.

Empire did fully analyze Dogwood's unsolicited proposal in direct competition with Empire's adopted preferred resource plan (which includes the Riverton 12 conversion project) through additional integrated resource analysis of these two competing alternatives.

While it was not required to do so, Empire hired Ventyx, an ABB Company ("Ventyx") in the Spring of 2013 to perform additional supply-side resource evaluation, referred to as the "Dogwood Study", which evaluates the option of converting Riverton 12 to a combined cycle unit versus purchasing a share of Dogwood's existing combined cycle unit for the 2016 timeframe. Empire's April 5, 2013 Dogwood Proposal Study Report was presented by Empire to Dogwood and to parties to the Empire 2013 IRP docket, File No. EO-2013-0547, and included the following conclusion:

> Ventyx performed the study described in this report by utilizing the 2013 IRP assumptions and the methodology reviewed by all parties in the scope of work statement as amended based on stakeholder input. *The study shows that the*

> *Riverton conversion project is the lowest cost[4] and lowest risk[5] resource option for Empire for its 2016 resource need. In addition, there are several other key factors such as operational issues, transmission and congestion costs and unit age that favor the Riverton 12 conversion option.* As mentioned, in January, 2013 Empire issued RFPs for the Riverton 12 conversion project. Empire will not be entering into any binding commitments for the 2016 supply-side resource until after April 30, 2013. Based on the preliminary analysis Empire presented to the interested parties and the results of the additional study detailed in this report, Empire plans to continue implementation of the Company's existing Compliance Plan which calls for the completion of Riverton 12 conversion project to allow for commercial operation by mid-2016. *It is Empire's position that the Riverton 12 conversion is the lowest cost 2016 supply alternative and should be treated as a committed resource in its 2013 IRP*. Empire plans to proceed with the finalization of its 2013 IRP and move forward with the Riverton 12 project. [Emphasis added.]

So, indeed, Empire did – through its Dogwood Study - fully analyze the Dogwood unsolicited proposal.

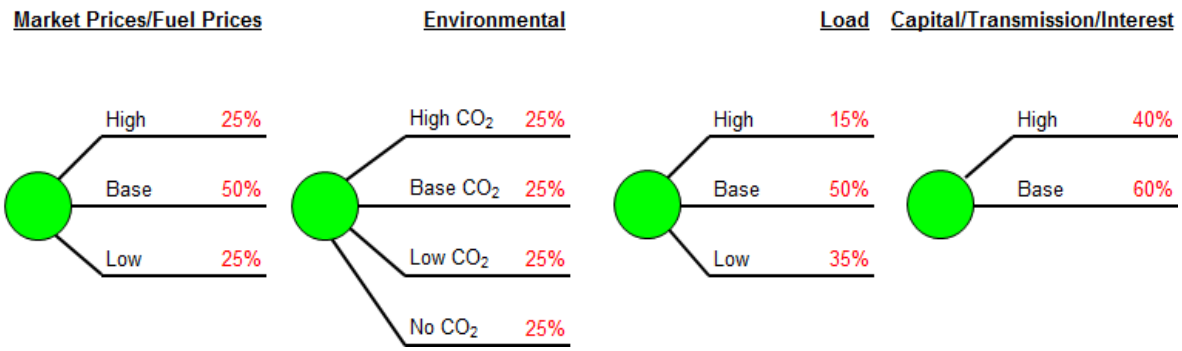
The Riverton 12 conversion project construction cost was modeled as uncertain in Empire's integrated resource analysis and did not ever have an expected cost of $125 million.

Empire identified construction cost as a critical uncertain factor[6] during its performance of minimum requirements of 4 CSR 240-22.070(2) for its 2010 IRP as evidenced by the following:

> "The experience in the electric utility industry with major construction projects suggests that the project is more likely to be at or above budget. Thus, Empire did not consider a branch lower than the base branch for capital/transmission//interest rates in order to help limit the number of endpoints in the decision tree. The high case is assigned a 40% probability whereas the base case was assigned a 60% probability. These probabilities suggest that project costs are more likely to be near the project cost estimate than to deviate significantly from that estimate."[7]

[4] From data on Figure 1-5 of Empire's Dogwood Study, the Riverton 12 conversion project has a 38-year risk adjusted PVRR which is $126 million and 1.05% less than that of the Dogwood alternative proposal.
[5] From data on Figure 1-4 of Empire's Dogwood Study shows the risk profiles of both supply-side options. At all endpoints, the Riverton 12 PVRR is lower than that of the Dogwood alternative proposal.
[6] Critical uncertain factor is any uncertain factor that is likely to materially affect the outcome of the resource planning decision.
[7] Section 3.4.4 Capital/Transmission/Interest Rate, Page 32 of Volume 5 in File No. EO-2011-0066.

Empire's decision tree in its 2010 IRP includes the following critical uncertain factors: environmental costs, market prices/fuel prices, load, and capital/transmission/interest rates. The decision tree is represented as follows:



Staff's review of the work papers in File No. EO-2011-0066 contains the following information for the uncertainty of the Riverton 12 conversion project's construction cost:

This Table

Is Deemed Highly Confidential

In Its Entirety

Thus - in Empire's 2010 IRP analysis - the Riverton 12 conversion project has a base case present value (in 2010 dollars) construction cost of ** _____ **, a high case present value construction cost of ** _____ ** and a risk adjusted present value construction cost of ** _____ **. Empire did recognize the distinct possibility that there may be cost overruns on its construction projects for the Riverton 12 conversion project – and placed a 40%[8] probability on such an occurrence and an estimated single point value of ** _____ **) of cost overruns actually happening.

[8] In its 2013 Triennial Compliance Filing and in the Dogwood Study, Empire continued to model capital/transmission/interest rates as a critical uncertain factor with high case probability of 30% and a base case probability of 70%.

Minimization of long-run utility costs is the primary selection criterion – but it is not the only selection criterion – when choosing the preferred resource plan.

While Dogwood has focused primarily upon the capital cost of its unsolicited offer and upon Empire's *expected base case cost* of the Riverton 12 conversion project, capital cost is just one element of cost for the utility when a making decision related to its electric utility resource planning as described in:

> 4 CSR 240-22.010 (2)[9] 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. The fundamental objective requires that the utility shall—
>
> (A) Consider and analyze demand-side resources, renewable energy, and supply-side resources on an equivalent basis, subject to compliance with all legal mandates that may affect the selection of utility electric energy resources, in the resource planning process;
>
> (B) *Use minimization of the present worth of long-run utility costs as the primary selection criterion in choosing the preferred resource plan, subject to the constraints in subsection (2)(C)*; and
>
> (C) *Explicitly identify and, where possible, quantitatively analyze any other considerations which are critical to meeting the fundamental objective of the resource planning process, but which may constrain or limit the minimization of the present worth of expected utility costs. The utility shall describe and document the process and rationale used by decision-makers to assess the tradeoffs and determine the appropriate balance between minimization of expected utility costs and these other considerations in selecting the preferred resource plan and developing the resource acquisition strategy.* These considerations shall include, but are not necessarily limited to, mitigation of:
>
> 1. Risks associated with critical uncertain factors that will affect the actual costs associated with alternative resource plans;
>
> 2. Risks associated with new or more stringent legal mandates that may be imposed at some point within the planning horizon; and
>
> 3. Rate increases associated with alternative resource plans. [Emphasis added.]

The Dogwood Study includes the following discussion of present value of revenue requirements ("PVRR") and other considerations taken into account by Empire when choosing the Riverton 12 conversion project instead of the Dogwood unsolicited proposal:

[9] Effective June 30, 2011.

As shown in the model results with the 2013 IRP assumptions, of the two options studied, the Riverton 12 conversion is the optimal supply-side option based on lower PVRR and risk assessment.[10] In addition, there exist other factors, most that favor the Riverton 12 conversion option. Many of these factors cannot be modeled or are difficult to quantify.

Operational factors

- In the Riverton 12 conversion option, Empire would be the owner-operator as compared to the Dogwood option where Empire would be a joint owner
  - As an owner-operator, Empire would have control of unit outage schedules and unit maintenance and can integrate the scheduled outages with other generating units
  - As an owner-operator, Empire could determine when to run or not run the unit, offering operational flexibility—which could be very important for an intermediate/peaking unit
- The Riverton conversion option is physically located at an existing Empire generating station close to Empire's load. This option can help with reliability and voltage support.

Transmission and congestion costs

- The Riverton 12 conversion option requires no additional transmission interconnection costs. When the Riverton 12 simple cycle unit was originally installed in 2007 it was designed and constructed with adequate natural gas piping and transmission to accommodate its conversion to a combined cycle unit at some point in the future.
- In the base and DSM cases of this study, no transmission interconnection costs were added for the Dogwood option since it was difficult to quantify the impact of these costs. However, this additional cost may be significant. In the decision tree portion of this study, in the high construction cost case, about $80.71/kW was added to the Dogwood construction cost for potential additional transmission costs based on the 2013 IRP assumption for generic resources.
- Due to physical grid limitations, transmission congestion cannot be eliminated or avoided. Transmission congestion cost is a relevant factor in this analysis, but Empire was not able to quantify these costs for this study, especially with an emerging market in the near future. Due to the proximity of the generation to the source the Riverton 12 conversion project has significantly less congestion risk compared to the Dogwood option. As mentioned, the Riverton generating station is located within Empire's service territory in Kansas about 9 miles west of Joplin, Missouri, the largest town served by Empire. The Dogwood unit is located in Pleasant Hill, Missouri, which is about 135 miles north of Joplin.

Unit age

[10] See footnotes 4 and 5.

- As mentioned, the existing Riverton 12 simple cycle unit was installed in 2007. This combustion turbine would be incorporated into the Riverton combined cycle and represent the oldest portion of the system. All other components of the Riverton combined cycle, including the heat recovery steam generator (HRSG); steam turbine; cooling tower; control room and control systems would be newly constructed for the 2016 in service date.
- In contrast, the Dogwood combined cycle unit was installed around 2001. This unit will be about fifteen years old in 2016 when the Riverton conversion option is proposed to be completed. In this 35 year study which begins in 2016, the Dogwood option was not modeled to retire. Therefore, this study does not include the benefit associated with the Riverton conversion's longer service life versus the Dogwood option.

Construction and price risk

- Inherent to any large construction project, the Riverton conversion has some construction risks that are not present in the Dogwood option.
- Dogwood offered a fractional ownership share of 100 MW in its combined cycle electric generation plant to Empire, at a price of ** _____ _____ _____ **. Even though this study considers a June 2016 in service date, the Dogwood price was not adjusted.

While the Dogwood Study does not comply with all of the requirements of Chapter 22, Staff finds that the Dogwood Study is a fair assessment of the primary selection criterion (PVRR) and other considerations relevant to this decision (operational factors, transmission and congestion costs, unit age and construction and price risk).

Chapter 22 Electric Utility Resource Planning does not result in Commission approval of a utility's resource plans, resource acquisition strategies, or investment decisions.

The original Chapter 22 Rules and the revised Chapter 22 Rules each state in 4 CSR 240-22.010(1): "Compliance with these rules *shall not be construed to result in commission approval of the utility's resource plans, resource acquisitions strategies, or investment decisions*." [Emphasis added.]

The Commission further clarified its determination concerning approval of resource plans in File No. EO-2011-0271:

> What, Staff, Public Counsel, and the intervening parties would really like is for the Commission to order Ameren Missouri to choose a different preferred

> resource plan that emphasizes the public's interest in maximizing energy efficiency. But that action is not within the Commission's authority in this proceeding regarding compliance with the IRP rule. For purposes of this case, the Commission determines that the company has sufficiently explained why it chose the preferred resource plan that it did and has therefore complied with the rule. *The Commission's determination of whether Ameren Missouri is in fact "providing the public with energy services that are safe, reliable and efficient, at just and reasonable rates, in a manner that serves the public interest"*[11] *must wait for the appropriate rate case in which the Commission can consider all relevant factors. Ultimately, the Commission may find that Ameren has adopted an imprudent resource plan, with financial consequences for the company flowing from that determination. But the IRP process is not the proper forum for that determination*.[12] [Emphasis added.]

Also, during the Commission's workshops and its rulemaking for revision of its Chapter 22 Rules in File Nos. EW-2009-0412 and EX-2010-0254, respectively, there were recommendations by the electric utilities that the electric utilities have the option of requesting preapproval of large investments as part of a utility's Chapter 22 compliance filing, and that the Commission formally *approve* large investments in the Chapter 22 compliance filing dockets. Ultimately, the Commission decided in its revised Chapter 22 Rules – promulgated in 2011 – that the Commission would not provide the option for such preapprovals as evidenced by its response to comments in its *Final Order of Rulemaking* for 4 CSR 240-22.080 in File No. EX-2010-0254:

> **COMMENT 3 • Preapproval of Large Projects:** *The electric utilities, through the MEDA rules, advocate for the option of requesting preapproval of large investments as part of a utility's Chapter 22 compliance filing.* Ameren Missouri asserts that preapproval is a way for the utility to seek determination of ratemaking treatment on a major project before the project begins. It also points out that the Missouri Energy Efficiency Investment Act (MEEIA) provides for preapproval of demand side resources. Ameren Missouri assertions that it is a logical extension to provide a preapproval option for large supply-side investments, if preapproval is requested by the utility. *Staff and Public Counsel oppose an option for preapproval of large projects. They argue that utilities already have authority to request additional regulatory certainty by requesting a regulatory plan or some other form of preapproval*. The utilities have utilized both of these approaches in the past, and it is unnecessary and inappropriate to include a preapproval process in the Chapter 22 rules. *Dogwood suggests the*

[11] 4 CSR 240-22.010(2)(A).
[12] See pages 9 – 10 of the Commission's March 28, 2012 *Report and Order* in File No. EO-2011-0271.

> *Commission open a new separate rulemaking process to consider proposals to develop a procedure by which electric utilities may seek preapproval from the Commission for certain large projects.*
>
> **RESPONSE:** The Commission agrees with its Staff and Public Counsel that *there are other more appropriate alternatives for preapproval and will not include a provision for preapproval of large investments in its Chapter 22 rules. The Commission is open to further discussion on the preapproval question, but will not undertake a rulemaking on the subject at this time.* [Emphasis added.]

Dogwood does not have to sell an equity position in its Dogwood Energy Facility in order to sell its generating capacity to the SPP Energy Imbalance Service Market ("EIS") or to monopoly utilities directly through a purchase power agreement.

Dogwood is a member of Southwest Power Pool ("SPP") and may offer its energy and operating reserves into SPP's EIS daily. The EIS market serves as a real-time market for generators to sell excess energy and for load serving entities (monopoly utilities) to receive energy using locational imbalance pricing ("LIP").[13] Thus, Dogwood has the opportunity to offer and sell its generated energy to SPP whenever it is economic for SPP to clear Dogwood's bid based upon all the generation that is offered into SPP's EIS. Further, it is expected that SPP will initiate an integrated marketplace in March 2014. SPP in creating this integrated market place will develop a day-ahead and real-time energy market in an effort to reduce energy and transmission costs for its market participants. This new integrated market place is a consolidation of 16 balancing authorities into a new single load balancing authority operated by SPP. SPP's day-ahead market will allow all market participants with generation resources to submit offers to sell energy and operating reserves, and all load serving entities within SPP balancing area to submit bids to purchase energy and operating reserves. After the day-ahead offers and bids are submitted for the day, SPP will clear all offers. The results of the day-ahead market will be the co-optimization[14] of energy resources across a wide and diverse footprint that matches sale offers with demand bids and satisfies operating reserve requirements. SPP's Real-

[13] LIP is a method of calculating the marginal price for energy and/or transmission at points in the road (known as nodes) on the grid reflecting transmission loading problems. The Federal Energy Regulatory Commission ("FERC") has proposed LIP as a way to achieve short- and long-term efficiency in wholesale electricity markets. This is similar to the current practice of calculation in economic dispatch for each utility as well as avoided costs for Qualifying Facilities ("QF") under Public Utility Regulatory Policies Act of 1978 ("PURPA"). http://www.spp.org/publications/lip/lmp/8 html

[14] The simultaneous\joint clearing of Energy and Operating Reserve with the objective of producing the system least operational cost solution: *Southwest Power Pool Integrated Markeplace dictionary and Quick Reference Guide.*

Time Market will also be co-optimized for the differences between quantities actually cleared in real-time and transactions forecasted to clear in the day-ahead market. In short, SPP's Integrated Marketplace will allow Dogwood a competitive market place in which to offer and sell its energy and operating reserves to other SPP market participants that include monopoly utilities.

Staff's Summary Comments

As a result of its limited review of certain of the assertions made by Dogwood in its Petition, Staff concludes that Dogwood's assertions reviewed above are not well-founded and should not be considered to be justification – in and of themselves – for going forward with a rulemaking proceeding although there are other bases addressed in Staff's accompanying response for going forward with a rulemaking respecting Commission Rule 4 CSR 240-3.105.

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of Dogwood Energy, LLC's Petition for Revision of Commission Rule 4 CSR 240-3.105	)))	File No. EX-2014-0205

AFFIDAVIT OF JOHN A. ROGERS

STATE OF MISSOURI)
) **ss**
COUNTY OF COLE)

John A. Rogers, employee of the Staff of the Missouri Public Service Commission, being of lawful age and after being duly sworn, states that he has participated in the preparation of the accompanying Staff Recommendation, in memorandum form, and the facts therein are true and correct to the best of his knowledge and belief.

John A. Rogers

Subscribed and sworn to before me this 14th day of February, 2014.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 03, 2014
Commission Number: 10942086

Notary Public

Educational Background and Work Experience of John A. Rogers

I have a Master of Business Administration degree from the University of San Diego and a Bachelor of Science degree in Engineering Science from the University of Notre Dame. My work experience includes 34 years in energy utility engineering, system operations, strategic planning, regulatory affairs and management. From 1974 to 1985, I was employed by San Diego Gas & Electric with responsibilities in gas engineering, gas system planning and gas operations. From 1985 to 2000, I was employed by Citizens Utilities primarily in leadership roles for gas operations in Arizona, Colorado and Louisiana. From 2000 to 2003, I was an executive consultant for Convergent Group (a division of Schlumberger) providing management consulting services to energy companies. From 2004 to 2008, I was employed by Arkansas Western Gas and was responsible for strategic planning and resource planning. I have provided expert testimony before the California Public Utilities Commission, Arizona Corporation Commission, Arkansas Public Service Commission and Missouri Public Service Commission in general rate cases, applications for special projects, gas electric resource plan filings, electric resource plan filings and demand-side programs investment mechanism cases. I have been employed by the Missouri Public Service Commission since December 2008 and am responsible for Staff's input to the regulatory process concerning electric utility resource planning, demand-side management programs, demand-side programs investment mechanisms, and fuel adjustment clauses.

John A. Rogers
Testimony, Reports and Rulemakings

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

File Number	Company	Issues
ER-2010-0036	Ameren Missouri	Fuel Adjustment Clause Demand-Side Programs (DSM) DSM Cost Recovery
EX-2010-0368 EW-2010-0254	Missouri Public Service Commission	Missouri Energy Efficiency Investment Act Rulemaking
EX-2010-0254 EW-2009-0412	Missouri Public Service Commission	Electric Utility Resource Planning Rulemaking
EO-2009-0237	KCP&L Greater Missouri Operations Company	Electric Utility Resource Planning Compliance Filing
ER-2009-0090	KCP&L Greater Missouri Operations Company	Fuel Adjustment Clause
ER-2010-0355	Kansas City Power and Light	DSM Cost Recovery Fuel Switching
ER-2010-0356	KCP&L Greater Missouri Operations Company	Fuel Adjustment Clause DSM Cost Recovery Fuel Switching
AO-2011-0035	All Electric Utilities	DSM Status Report
EO-2011-0066	Empire District Electric Company	Electric Utility Resource Planning Compliance Filing
ER-2011-0028	Ameren Missouri	DSM Cost Recovery
EO-2011-0271	Ameren Missouri	Electric Utility Resource Planning Compliance Filing
EO-2012-0009	KCP&L Greater Missouri Operations Company	Demand-side Programs Investment Mechanism
EO-2012-0142	Ameren Missouri	Demand-side Programs Investment Mechanism
ER-2012-0166	Ameren Missouri	DSM Cost Recovery

John A. Rogers
Testimony, Reports and Rulemakings

Demand-side Programs
Investment Mechanism

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION (cont.)

File Number	Company	Issues
ER-2012-0174	Kansas City Power & Light	DSM Cost Recovery
ER-2012-0175	KCP&L Greater Missouri Operations Company	DSM Cost Recovery Demand-side Programs Investment Mechanism
ER-2012-0345	Empire District Electric Co.	DSM Cost Recovery

BEFORE THE ARKANSAS PUBLIC SERVICE COMMISSION

Docket Number	Company	Issues
07-079-TF	Arkansas Western Gas	Arkansas Weatherization Program
07-078-TF	Arkansas Western Gas	Initial Energy Efficiency Programs
07-041-P	Arkansas Western Gas	Special Contract
06-028-R	Arkansas Western Gas	Resource Planning Guidelines for Electric Utilities
05-111-P	Arkansas Western Gas	Gas Conservation Home Weatherization Program