

ATTACHMENT C

WAIVER REQUESTS RELATED TO INTEGRATED RESOURCE ANALYSIS 4 CSR 240-22.060

(1) 4 CSR 240-22.060 (4)

Current Requirement:

The utility shall assess the relative performance of the alternative resource plans by calculating for each plan the value of each performance measure specified pursuant to section (2). This calculation shall assume value for uncertain factors that are judged by utility decision-makers to be most likely.

Proposed Alternative:

UE will assess the relative performance of the alternative resource plans by calculating for each plan the value of each performance measure specified pursuant to section (2). This calculation shall be performed for each scenario in the probability tree.

Rationale:

This is fundamental to the analysis described in Section II of the 4 CSR 240-22.070 Risk Analysis and Strategy Selection waiver requests, and shown at the start of Step 2 illustrated in Attachment 1 of the waiver requests. For each individual scenario, at least two alternative resource plans will be selected to become candidate plans because one or both of them would be the “preferred plan” under that scenario, if that scenario were a certainty. This means that AmerenUE will perform the analysis envisioned by this rule for far more combinations of events than just a “most likely” one, and it will use resulting uncertainties in the ranking of the alternative resource plans to select a set of candidate resource plans for the risk analysis phase where the responsiveness of performance measures to the full range of critical uncertain factors for each candidate resource plan. This is a superior approach to the use of just a single “most likely” value for uncertain factors that are associated with a single scenario.