

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)	

SUGGESTED SPECIAL CONTEMPORARY ISSUES OF NRDC

Pursuant to 4 CSR 240-22.080(4), the Natural Resources Defense Council recommends the following as special contemporary resource planning issues for consideration and analysis by Empire.

1. In addition to the exercise prescribed in 4 CSR 240-22.045, Empire should analyze integrated distribution planning as a way to manage the distribution grid in a manner that reduces peaks and fills valleys in load profiles and lowers overall system costs with a combination of energy efficiency, demand response, electric vehicles, distributed generation, storage, advanced metering, and pricing strategies such as time-of-use rates (TOU) and inclining block rates (IBR).
2. Analyze and assess the use of mechanisms such as green tariffs and community solar to increase the availability of distributed generation for large and small customers.
3. Analyze and document the prospects for using securitization to advance the retirement of coal generation assets and channel the savings into more economical investments such as demand-side management, building wind and solar generation, and satisfying corporate renewable energy goals to attract new business to the service territory. Securitization is essentially a lower cost, long-term loan that ratepayers take out and pledge to repay using

a portion of their future electricity bills using a long-term, lower-cost bond that will save customers money, some of which can be used as new capital.

4. Analyze, document and screen the prompt retirement of the Asbury plant as a resource option.

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 NRDC

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