STATE OF MISSOURI PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held at its office in Jefferson City on the 18th day of September, 2019.

| In the Matter of an Investigation of Missouri Jurisdictional Generator Self-Commitments into SPP and MISO Day-Ahead Energy Markets |))) | File No. EW-2019-0370 |
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| In the Matter of an Investigation of Missouri Jurisdictional Generator Self-Commitments into SPP and MISO Day-Ahead Energy Markets - Ameren Missouri |))) | File No. EW-2020-0032 |
| In the Matter of an Investigation of Missouri Jurisdictional Generator Self-Commitments into SPP and MISO Day-Ahead Energy Markets - Kansas City Power & Light Company |))) | File No. EW-2020-0033 |
| In the Matter of an Investigation of Missouri Jurisdictional Generator Self-Commitments into SPP and MISO Day-Ahead Energy Markets - KCP&L Greater Missouri Operations Company |))) | File No. EW-2020-0034 |
| In the Matter of an Investigation of Missouri Jurisdictional Generator Self-Commitments into SPP and MISO Day-Ahead Energy Markets - The Empire District Electric Company |))) | File No. EW-2020-0035 |

ORDER ACCEPTING STAFF'S REPORT REGARDING ITS INVESTIGATION OF MISSOURI JURISDICTIONAL GENERATOR SELF-COMMITMENTS AND SELF-SCHEDULING, AND SEEKING ADDITIONAL INFORMATION

Issue Date: September 18, 2019 Effective Date: September 18, 2019

The Commission opened this investigative case on June 5, 2019, and directed its Staff to begin an investigation into the self-commit and self-scheduling practices of Missouri's investor-owned electric utilities in their respective RTO energy markets to

determine if such practices inure to the benefit of their ratepayers. As directed, Staff filed a report regarding the results of its investigation in File No. EW-2019-0370 on August 23, 2019. On the same date it filed a supplemental highly confidential report about the practices of each Missouri investor-owned electric utility in the file created for each such utility. The Sierra Club filed comments regarding Staff's report on September 6, 2019. Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company, as well as Union Electric Company d/b/a Ameren Missouri, filed responses to Sierra Club's comments on September 16, 2019.

The Commission accepts Staff's report in each of these files and understands that the continued analysis of issues regarding the practice of self-commitments will most appropriately take place within the Fuel Adjustment Clause (FAC) prudency review proceedings, or within a rate case. However it may also be appropriate to consider those practices in the utility's IRP triennial or annual update filings. As part of its recommended special contemporary issues for each utility's next IRP filing, Staff indicated it would have additional questions for the utilities regarding "economic minimum" and "unit minimum."

The Commission will direct the investor-owned electric utilities to provide the additional information Staff seeks. They shall file that information in EW-2019-0370 to the extent possible, but may file any highly confidential information in their respective files that were established for that purpose. The Commission will also direct Staff to file a supplemental report regarding the information it receives.

¹ File Nos. EO-2020-0044, EO-2020-0045, EO-2020-0046, and EO-2020-0047.

THE COMMISSION ORDERS THAT:

- 1. No later than October 2, 2019, the investor-owned electric utilities (Union Electric Company d/b/a Ameren Missouri, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and The Empire District Electric Company, a Liberty Utilities Company) shall separately answer the following questions:
 - a) What is their definition of "economic minimum" or "unit minimum"?
 - b) How do they establish an "economic minimum" or "unit minimum"?
 - c) What are the pros and cons of allowing self-committing up to that amount?
 - d) Why does the "economic minimum" or "unit minimum" vary?
- 2. Staff shall file a supplemental report regarding the additional information provided by the investor-owned electric utilities by October 16, 2019.
- 3. Any stakeholder that wishes to respond to Staff's supplemental report shall do so no later than October 23, 2019.
 - 4. This order shall be effective when issued.

BY THE COMMISSION

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Morris L. Woodruff Secretary

Silvey, Chm., Kenney, Hall, Rupp, and Coleman, CC., concur.

Woodruff, Chief Regulatory Law Judge

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 18th day of September 2019.

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Morris L. Woodruff

Secretary

MISSOURI PUBLIC SERVICE COMMISSION September 18, 2019

File/Case No. EW-2019-0370, EW-2020-0032, EW-2020-0033, EW-2020-0034 and EW-2020-0035

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Union Electric Company

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,

Morris L. Woodruff

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Secretary

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.