

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Proposed)	
Amendment of the Commission's Rule)	
20 CSR 4240-3.190 Reporting)	<u>File No. EX-2025-0034</u>
Requirements for Electric Utilities and)	
Rural Electric Cooperatives)	

STAFF COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission and states as follows:

1. Staff supports the proposed amendments to 20 CSR 4240-3.190, published in the Missouri Register dated September 16, 2024, with some revisions as detailed in the attached Staff Comment. The proposed amendments are essential to the health, safety, and welfare of Missouri residents by ensuring that the Commission is timely informed of certain data and events that may impact future rate proceedings and the provision of safe and adequate service by the electrical corporations and the provision of safe service by the rural electric cooperatives.

2. This Commission rule was last substantively amended effective August 2010. Since the last rule amendment there has been significant changes in energy market operations, metering technology, coal plant retirements, and additions of renewable energy resources. Additionally, the proposed amendment was drafted to align with the objective of improving internal processes to more efficiently process electric rate cases.

3. Staff recommends one edit to the proposed Amendment to reflect that a new electrical contact reporting form was published on the Commission website on September 24, 2024. Staff edited the form to be consistent with certain language changes

in the proposed amendment and to set up a single email address for electrical contact reporting (ElectricalReporting@psc.mo.gov). 20 CSR 4240-3.190(4)(D) should read:

D) Contact information for designated commission personnel is included on the Missouri Public Service Commission Electrical Contact Reporting Form, incorporated by reference, as published by the commission, [*July 17, 2023*] September 24, 2024, and provided on the commission website at psc.mo.gov.

WHEREFORE, Staff respectfully submits these comments for the Commission's consideration and supports the proposed amendments to 20 CSR 4240-3.190.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 3rd day of October, 2024.

/s/ J. Scott Stacey

MEMORANDUM

TO: Missouri Public Service Commission
Official Case File, Case No. EX-2025-0034

Proposed Amendment of the Commission's Rule 20 CSR 4240-3.190
Reporting Requirements for Electric Utilities and Rural Electric Cooperatives

FROM: /s/ Claire M. Eubanks, P.E. / 10-03-2024
Manager, Engineering Analysis / Date

SUBJECT: Staff Comments on Proposed Amendment to 20 CSR 4240-3.190

DATE: October 3, 2024

SUMMARY

Staff supports the proposed amendment to 20 CSR 4240-3.190. The proposed amendments are essential to the health, safety, and welfare of Missouri residents by ensuring that the Commission is timely informed of certain data and events that may impact future rate proceedings and the provision of safe and adequate service by the electrical corporations and the provision of safe service by the rural electric cooperatives.

This Commission rule was last substantively amended effective August 2010. Since the last rule amendment there has been significant changes in energy market operations, metering technology, coal plant retirements, and additions of renewable energy resources. Additionally, the proposed amendment was drafted to align with the objective of improving internal processes to more efficiently process electric rate cases.

Staff recommends one edit to the proposed Amendment to reflect that a new electrical contact reporting form was published on the Commission website on September 24, 2024. Staff edited the form to be consistent with certain language changes in the proposed amendment and to set up a single email address for electrical contact reporting (ElectricalReporting@psc.mo.gov). 20 CSR 4240-3.190(4)(D) should read:

D) Contact information for designated commission personnel is included on the Missouri Public Service Commission Electrical Contact Reporting Form, incorporated by reference, as published by the commission, [July 17, 2023] September 24, 2024, and provided on the commission website at psc.mo.gov.

DISCUSSION

On December 20, 2020, Staff recommended the opening of a working docket to consider a revision to the Commission's Rule on Reporting Requirements for Electric Utilities and, as applicable, Rural Electric cooperatives, found at 20 CSR 4240-3.190. This Commission rule was last substantively amended effective August 2010. Since the last rule amendment there has been significant changes in energy market operations, metering technology, coal plant retirements, and the addition of renewable energy resources.

In late 2020, Staff's proposal was intended to update the existing reporting requirements for technology and market advancements while also improving the information reported to Staff. Staff's original proposed solution included:

1. Require the provision of interval data by the utility on a monthly basis, and retention of interval data for retrieval and study.
2. Require the provision of hourly day-ahead cleared, real-time, and ancillary services at each generating unit.
3. Require the provision of hourly day-ahead schedule and real-time load at load nodes.
4. Require the consistent reporting of generation from PPAs as purchased power.
5. Require that format changes in reported data be accompanied by notification from the utility and an explanation of the changes made.
6. Require that password protection be removed from any electronic data file submitted to the Commission to meet these reporting requirements.
7. Require enhanced reporting of decisions to permanently retire power plants.
8. Require the reporting of unit heat rate curve data.
9. Require the reporting of unit ramp rate data.
10. Require the reporting of unit variable operations and maintenance data.
11. Require the reporting of fuel price data used for dispatch of coal units, when the dispatch fuel price uses the market price of coal.
12. Require reporting of outages due to unforeseen occurrences.

In response to Staff's outline of solutions, the Commission received written comments from the rate-regulated electric utilities during the first quarter of 2021. Staff considered the written comments when developing its proposed rule language. More recently, Staff began work to

consider internal process improvements to more efficiently process electric rate cases and the proposed amendment was drafted to align with this objective. Currently, Staff utilizes the data reported in 20 CSR 4240-3.190 to conduct production cost modeling during an electric rate case. However, due to changes in energy market operations, metering technology, and the energy transition, Staff supplements the data in 20 CSR 4240-3.190 with discovery conducted in each rate case. By requiring this data to be supplied monthly and in a consistent format, Staff estimates at least 56 hours of Staff time will be saved per rate case.

After consideration of written comments from the electric utilities, and further discussions with the Association of Missouri Electric Cooperatives and the rate-regulated electric utilities, Staff drafted rule language that incorporated or modified its initial proposed solution as further explained below:

1. Rather than requiring the retention of interval data for retrieval and study, the proposed amendment will require the monthly provision of hourly total load by wholesale, sale for resale, and retail load by rate code or voltage. (Proposed Amendment 20 CSR 4240-3.190(2)(A)6.)
2. Require the provision of hourly day-ahead cleared, real-time, and ancillary services at each generating unit. (Proposed Amendment 20 CSR 4240-3.190(2)(A)4.)
3. Require the provision of hourly day-ahead schedule and real-time load at load nodes. (Proposed Amendment 20 CSR 4240-3.190(2)(A)5.)
4. Rather than specifying the reporting of Power Purchase Agreements as purchased power, the proposed amendment requires the use of a standard template (see Attachment A) thus improving the consistency of reporting from the electrical corporations. (Proposed Amendment 20 CSR 4240-3.190(2)(B))
5. Rather than requiring notification of changes, the proposed amended requires the use of a standard template (Proposed Amendment 20 CSR 4240-3.190(2)(B))
6. Item 6 also solved by the use of a standard template. (Proposed Amendment 20 CSR 4240-3.190(2)(B))
7. Require enhanced reporting of decisions to permanently retire power plants. (Proposed Amendment 20 CSR 4240-3.190(1)(G))
8. Require the reporting of unit heat rate curve data. (Proposed Amendment 20 CSR 4240-3.190(1)(D))

9. Rather than separately specifying unit ramp data, Staff expects to receive this information through the reporting on ancillary services. (Proposed Amendment 20 CSR 4240-3.190(2)(A)4.)
10. Rather than requiring the reporting of unit variable operations and maintenance data, other requirements contained in the rule can be used by Staff to approximate variable operations and maintenance.
11. The amendment as proposed does not require the reporting of fuel price data used for dispatch of coal units, when the dispatch fuel price uses the market price of coal, as initially proposed by Staff.
12. Require reporting of outages due to unforeseen occurrences. (Proposed Amendment 20 CSR 4240-3.190(3)(A)3.) Additionally, the proposed amendment requires the reporting of forced outages of wind and solar generating plants in certain situations (Proposed Amendment 20 CSR 4240-3.190(3)(A)4.) and the loss of transfer capability into or out of the electric utility's system. (Proposed Amendment 20 CSR 4240-3.190(3)(A)6.)
13. The proposed amendment includes modifications to the language regarding electrical contact reporting requirements. These changes are intended to simplify rule language and clearly identify the acceptance of these reporting notifications through the Commission's Electronic Filing and Information System. Additionally, the proposed amendment corrects rule citations. (Proposed Amendment 20 CSR 4240-3.190(4), (5), and (7))

Staff supports the proposed amendment to 20 CSR 4240-3.190 and recommends one edit to the proposed Amendment to reflect that a new electrical contact reporting form (see Attachment B) was published on the Commission website on September 24, 2024.

Missouri Public Service Commission Electrical Contact Reporting Form

Reporting Requirements Pursuant to [20 CSR 4240-3.190\(4\)](#)

Notification of any electrical contact shall be provided to designated personnel by the end of the first business day following the discovery. A written report consisting of any details not available at the time of the initial notification including information relevant to the circumstances of the incident shall be submitted within ten (10) business days following the initial notification. Notifications may be made through the Electronic Filing and Information System or by contacting designated personnel.

Reporting Electric Utility or Rural Electric Cooperative:			
Authorized Representative (Name, Phone Number, and Email):			
Location of Event:	City:	County:	Address:
Date and Time of Event	Date of Event:	Time of Event:	
Number of Persons Injured:			
Number of Injuries Requiring Hospital Admissions:			
Number of Fatalities:			
Did the event result in an outage?	If yes, number of consumers affected:	Date service is expected to be restored:	
Description of Incident: (attach additional pages if necessary) <i>As applicable, please include: the number of persons injured, type and extent of injuries, cause (if known), extent of any resulting outages, identification of the physical equipment of such electric utility or cooperative, a description of work being performed at the location, weather conditions, and the land use surrounding the scene of the incident.</i>			

Signed:

Date:

Updated 9/24/24

Designated Contacts:

Phone:

Manager, Engineering Analysis
573-526-2953

Email:

ElectricalReporting@psc.mo.gov

Faxes may be sent to:

573-526-0145

Hardcopy reports may be mailed to:

Manager, Engineering Analysis
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102