BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of an Investigation of Missouri Jurisdictional Generator Self-Commitments into SPP and MISO Day-Ahead Energy Markets |))) | <u>File No. EW-2019-0370</u> |
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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 |))) | <u>File No. EW-2020-0032</u> |
| 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 |))) | <u>File No. EW-2020-0033</u> |
| 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 |))) | <u>File No. EW-2020-0034</u> |
| 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 |))) | <u>File No. EW-2020-0035</u> |

ORDER DIRECTING FURTHER RESPONSES

Effective Date: October 16, 2019

Issue Date: October 16, 2019

The Commission opened this file as a working case to facilitate Staff's investigation of the self-commit and self-scheduling practices of Missouri's investor-owned electric utilities in their respective RTO energy markets. Staff filed its report describing the results of its investigation on August 23, 2019. The Commission accepted Staff's report, but directed the electric utilities to answer several additional questions regarding "economic" or "unit" minimums. While the utilities complied with that order, they failed to provide adequate substance in their responses. Staff filed a supplemental report regarding the utility responses on October 7, 2019.

Staff explained that to fully consider the questions raised by the utility responses, it would need the answers to some more detailed questions. The Commission will direct the utilities to respond to the questions raised by Staff.

THE COMMISSION ORDERS THAT:

1. 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 shall answer the following questions by October 25, 2019:

A. Are the economic or unit minimums established based upon the physical limitations of each plant?

B. Are the economic or unit minimums established based upon the optimization of operation of each plant?

C. What factors are considered in the determination of the economic or unit minimums?

(i) What weighting is applied to each factor in the determination of the economic or unit minimums?

D. Do the economic or unit minimums ever vary for any reason other than the physical characteristics of the individual plant with the exception of unit testing?

(i) With the exception of unit testing, explain each instance that the utility deems that this action is appropriate for purposes of bidding into each market

(a) What are the potential economic outcomes from such action?

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(b) Provide quantification of the benefits and detriments of each instance which the economic or unit minimum varied for reasons other than the physical characteristics of the individual plant.

(c) How often is an analysis conducted regarding the economic outcome of variances from physical characteristics within the bidding strategy of the unit?

(d) Who is responsible for determining the appropriateness of variances from physical characteristics within the bidding strategy of the unit?

2. The Commission's Staff shall file a supplemental report no later than November 8, 2019.

3. This order shall be effective when issued.

BY THE COMMISSION



Corris I Woodruff

Morris L. Woodruff Secretary

Morris L. Woodruff, Chief Regulatory Law Judge, by delegation of authority pursuant to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri, on this 16th day of October, 2019.

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 16th day of October 2019.



Morris L. Woodruff Secretary

MISSOURI PUBLIC SERVICE COMMISSION

October 16, 2019

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

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Sincerely,

Jorris L Woodrugh

Morris L. Woodruff 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.