

1 BEFORE THE PUBLIC SERVICE COMMISSION

2 STATE OF MISSOURI

3 TRANSCRIPT OF PROCEEDINGS

4 RULEMAKING HEARING

5
6 In the Matter of the Proposed)
7 Amendment of the Commission's) File No. EX-2025-0034
8 Rule 20 CSR 4240-3.190)
9 Reporting Requirements for)
10 Electrical Utilities and)
11 Rural Electric Cooperatives)

12 FRIDAY, OCTOBER 11, 2024

13 10:00 a.m. - 10:20 a.m.

14 VOLUME I

15 Governor Office Building
16 200 Madison Street
17 Jefferson City, Missouri 65101

18 NANCY DIPPELL, Presiding
19 DEPUTY CHIEF REGULATORY LAW JUDGE

20 KAYLA HAHN, Chair
21 JASON R. HOLSMAN,
22 JOHN MITCHELL,
23 COMMISSIONERS

24 Reported By:
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 Job No.: 173542

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1 Proceedings began at 10:00 a.m.:

2 JUDGE DIPPELL: We can go on the record.
3 Good morning. This is File No. EX-2025-0034 in the
4 matter of the proposed amendment of the Commission's
5 Rule 20 CSR 4240-3.190, reporting requirements for
6 electric utilities and rural electric cooperatives.

7 My name is Nancy Dippell. I'm the
8 regulatory law judge presiding over this matter, and
9 we are here today in the Governor Office Building on
10 October 11th at 10:00 a.m. to have a rulemaking
11 hearing for this rule. We had some written comments
12 filed from Evergy and Office of Public Counsel and
13 Staff, and we also had some responses to those items
14 filed which I will adopt as if those were comments
15 presented at this hearing and they are in the record,
16 are in the Commission's record file and we will
17 consider those. I have -- I have Chair Hahn here
18 with me and I have Commissioner Holsman and
19 Commissioner Mitchell online. We may have other
20 commissioners joining us as we go.

21 And I think that we will -- I'm going to
22 begin with Staff. I guess I'm skipping over, since
23 we were just here on Tuesday in another rulemaking ,
24 but as you all know, rulemaking hearings are
25 different than our regular evidentiary hearings.

1 Anyone can make a comment. You don't have to be
2 represented by an attorney. Attorneys can make
3 comments. So in that regard, it's a little
4 different.

5 I'm going to ask Staff to go ahead and
6 make your comments first, and then I'll start down
7 the line, go to OPC. And I'll let you all make
8 responses to each other as needed as we go. And I
9 know we have at least one person, Mr. Fischer,
10 online. If he needs to make a comment, we'll get to
11 that at that time. So Staff.

12 MR. STACEY: Thank you, Judge. Good
13 morning, Judge, Commissioners. I'm Scott Stacey
14 representing Staff. Staff submitted the proposed
15 amendments to 20 CSR 4240-3.190, and with that,
16 supports the amendment. This rule was substantively
17 admitted August 2010. There's been significant
18 changes in energy market operations, metering
19 technology, coal plant retirements, and additions of
20 renewable energy resources since then.

21 The proposed amendment was drafted to
22 align with the objective of improving internal
23 processes to more efficiently process electric rates.
24 Staff has proposed one edit to the proposed
25 amendment to reflect a new electrical contact

1 reporting form, was published on the Commission
2 website on September 24th, 2024, as outlined in
3 Staff's comment filed in EX-2025-0034 on October 3rd.
4 There's also a 3.190 templates which is --
5 inadvertently was not attached to the memo filing --
6 it was this morning -- as an Attachment A templates.

7 OPC and Evergy filed comments to the
8 amendment on the same date wherein Staff developed a
9 comprehensive list of comments to include OPC and
10 Evergy's comments. This was filed on October 8th
11 and -- to assist the Commission rendering a decision
12 on the rule and additional suggested changes.

13 If you have any questions or comments --
14 or questions, Staff members Claire Eubanks, Sarah
15 Lange, Shawn Lange, and J Luebbert are here to answer
16 any questions you may have. Thank you.

17 JUDGE DIPPELL: Thank you. Do you have
18 any questions, Commissioner? Are there any online
19 commission questions? I'll just kind of throw it
20 open. If you don't have any questions, then that's
21 fine. If I don't hear you, speak up. I'll just
22 assume there's none. I'm not hearing any. Okay.
23 Thank you, Mr. Stacey. And I appreciate Staff's
24 summary of the comments. Would OPC like to make
25 comments?

1 MR. WILLIAMS: Yes. Lena Mantle's here
2 to make some comments. As you know, Public Counsel
3 filed some written comments and then there were
4 responses filed in the case to those comments. And
5 Lena Mantle has some explanation and comments to make
6 in response to that, as well as provide any
7 clarification the Commission might want to ask her
8 about Public Counsel's comments.

9 JUDGE DIPPELL: And just to clarify, that
10 is Nathan Williams speaking.

11 MR. WILLIAMS: Yes. Nathan Williams for
12 Public Counsel.

13 JUDGE DIPPELL: Thank you.

14 MR. WILLIAMS: We also have some
15 documents that probably will assist the Commission
16 and maybe should be included in the record as part of
17 Lena Mantle's explanation.

18 JUDGE DIPPELL: Okay. I can mark those
19 as Hearing Exhibit 1 and --

20 MR. WILLIAMS: How many copies would you
21 like?

22 JUDGE DIPPELL: If you could give the
23 Chair and I each a copy and then --

24 MR. WILLIAMS: Court reporter too?

25 JUDGE DIPPELL: Court reporter. Hand one

1 to the court reporter and then --

2 MR. WILLIAMS: Whoever out in the
3 audience --

4 JUDGE DIPPELL: Anybody else that's here
5 that would like one.

6 MR. WILLIAMS: I think we have enough to
7 do that.

8 JUDGE DIPPELL: All right.

9 MR. WILLIAMS: Thank you.

10 MS. MANTLE: Would you prefer me to be on
11 the witness stand?

12 JUDGE DIPPELL: No, you're fine.

13 MS. MANTLE: Okay. I want to thank you
14 for this opportunity to respond to this rulemaking.
15 As you may or may not know, this rule goes back to
16 the '80s. I actually used data from -- that was
17 provided through this rule when I was on the
18 Commission Staff and remember boxes of this data
19 being in storage room when I left in 2012. So this
20 data has proved to be very useful in the past.

21 And since 2010, there's been a lot happen
22 and the rule did need some updating that -- the data
23 it provided was -- provides now is very valuable, but
24 there's more data that would be very helpful as we've
25 gotten markets, energy markets are utilities very

1 involved in those. And -- and that would be the
2 reason that OPC added to the rule requirements for
3 hourly day ahead and real-time locational market
4 pricing, LMPs.

5 The Staff responded that this data is
6 available from other sources. It is. I would
7 challenge anyone to go to the SPP website and try to
8 find it. It's not easy to find. And last time I
9 tried to download -- or I downloaded any, it was by day,
10 and it was -- yes, it's available; it just wasn't
11 easy to get to. I understand Staff is able to get it
12 an alternative way as through S&P, S&G -- they've got
13 a source for it. OPC also has access to that
14 normally, but right now we don't. There's been some
15 problems with our access to that. So we don't have
16 that same access, but the companies do have this
17 information. And it would just be good to have it
18 all in one spot, to have the generation, the hourly
19 generation, the hourly LMPs to come through -- come
20 in response to this rule.

21 One of the documents that Mr. Williams
22 handed you is -- has a table on it. And that's -- I
23 took Staff's table and mostly duplicated what it had
24 regard its responses to OPC. I tried to make it
25 shorter, but I don't know that I achieved that. I'm

1 not going to go through every one of the OPC's
2 response. Some of them, they made some suggestions
3 that I adopted, and that would be -- there's two more
4 handouts. One is a red-line strike out which is
5 OPC's modified in response to Staff's comments. And
6 then the other is with the red-line strike out out,
7 so you can read the rule as it would be.

8 The only other thing that I would like
9 to -- there's I guess a couple things I wanted to
10 speak to other than the LMP. The other evolution
11 since 2010 has been now we have a whole lot of
12 renewables resources. And when these rules were
13 written, thermal was all that was out there that our
14 utilities were using. And OPC put in some
15 requirements; we called it battery storage
16 facilities. Staff proposed a different definition,
17 I'm fine with that, but Staff also said, Well,
18 let's wait and see. We'll look at these rules again
19 in 2029.

20 The truth of it is our utilities have
21 small pilot programs of battery storage now, and all
22 of them have battery storage in their long-range
23 resource plans. So I don't think it's a good idea to
24 wait. It's better now to start when its small and
25 see if this is the right information, if the words

1 are correct. And then in 2029 when the rule's
2 reviewed again, then perhaps make some modifications
3 to that. So that's -- it -- I believe that the rule
4 needs to be proactive where it can.

5 And there's one other thing that OPC's
6 proposed to help with that is, and in both of the
7 sections on hourly -- or on the provision of monthly
8 data, we propose that language be inserted that
9 allows the Commission in a general rate case to order
10 additional information. This is currently in the FAC
11 monthly reporting rule. And how that has worked with
12 the FAC is parties propose in the rate case, in their
13 testimony, the Company and the party works it out.
14 Usually there's an agreement, Yeah, we'll provide
15 this in the monthly reports. But what that's allowed
16 us to do is ask for information that we weren't aware
17 existed or it's new information as time goes on,
18 rather than changing the rule to try to get these.
19 It does -- being done in a rate case, it does allow
20 the utility to come back and present, No, this
21 doesn't work very good or you don't have it right.
22 And it does too allow for the Commission to say, No,
23 that's too much.

24 So it's not just throwing stuff out there
25 and putting a lot more requirements on the companies.

1 And with that, I think I will end my
2 comments. And I appreciate the opportunity to have
3 comments on this rule.

4 JUDGE DIPPELL: Thank you. Chair Hahn,
5 did you have any questions?

6 CHAIR HAHN: Just one. With additional
7 reporting, one of the things that we really try to
8 look at when we're evaluating rules and whether to
9 move them forward is the cost impact. Are any of the
10 modifications that you're making, what kind of -- do
11 you estimate that they would have a cost impact
12 to the utilities that would drive the fiscal note on
13 this particular rule?

14 MS. MANTLE: Staff did put in the
15 response table information that GADS requires. Let's
16 see. On my table on page 4, the bottom right corner
17 talks GADS wind generation, GADS solar generation
18 data reporting instructions. So they listed off the
19 things that GADS, which is Generating Availability
20 Data System, that the electric utilities report to
21 NERC. So these are -- these are things that NERC
22 requires of them, and it's the same thing that's in
23 this rule. So they're not being asked to keep more
24 than that.

25 And as I said before, the LMP data, they

1 have it, so it's -- it's not asking for anything that
2 they don't have. I hate to say lightly that, Gee, it
3 should be easy. I don't work for the utilities. I'm
4 not -- you know. But to me it seems it's there. It
5 would be just part of their normal operating to
6 provide this monthly. And it shouldn't, as far as I
7 know, it shouldn't be a big burden. It shouldn't
8 increase the fiscal cost.

9 JUDGE DIPPELL: Are there any other
10 commission questions? Don't hear any. Okay. Is
11 there anyone else that wished to comment? There's no
12 one else in the room. Is there anyone online that
13 wish to offer any comments?

14 MR. FISCHER: Judge, this is Jim Fischer
15 on behalf of Evergy. I would just say that Evergy
16 has worked with Staff on the rules, and we are
17 generally supportive of the rule as it's published or
18 it was originally published. And I really don't have
19 any other statement, but if you have questions, I'll
20 try to answer them. Thank you.

21 JUDGE DIPPELL: All right. Thank you,
22 Mr. Fischer. Any questions from the Commission for
23 Mr. Fischer?

24 CHAIR HAHN: Yes. Mr. Fischer, good
25 morning.

1 MR. FISCHER: Morning.

2 CHAIR HAHN: I did have your reply to
3 OPC's modifications and requests. And I just asked
4 Ms. Mantle if any of the suggestions that she had
5 made had a fiscal impact. Her response was, you
6 know, you have the data so shouldn't be cost
7 prohibitive. Do you agree with that?

8 MR. FISCHER: You know, I don't -- I
9 don't know that my client has addressed the cost of
10 it. There were a couple small comments regarding the
11 ability to already provide it in kilowatt-hour format
12 rather than megawatt hours and they were concerned
13 about an open ended, you know, catch-all phrase that
14 the Public Counsel suggested. But I don't --
15 unfortunately I don't have a dollar amount for either
16 of those. I think it would really depend on what
17 they -- the request was for.

18 CHAIR HAHN: Thank you.

19 JUDGE DIPPELL: Any other commission
20 questions? Don't see any. Thank you, Mr. Fischer.
21 Is there anyone else that wishes to comment?

22 MS. EUBANKS: Yes. Staff will just
23 provide just a couple clarifications regarding --

24 JUDGE DIPPELL: Can you give her, the
25 court reporter, your name, just to --

1 MS. EUBANKS: This is Claire Eubanks with
2 Staff.

3 JUDGE DIPPELL: Go ahead.

4 MS. EUBANKS: There was one comment
5 Everygy just made about megawatt hours versus kilowatt
6 hours. We just wanted to clarify that our agreement
7 is that it would be clearer if it was specified in
8 the rule, but we don't have a preference. It's an
9 easy conversion from our opinion. So if Everygy
10 prefers kilowatt hours for that specific request, I
11 don't think we have a problem with that.

12 And I think -- and just to clarify on
13 battery storage, we're not opposed to it being
14 included in the rule now. Not clear exactly on the
15 cost impact as I sit here today. But we also
16 offered, you know, we could also wait and look at
17 another rule review or when battery storage is added
18 to a utility system. We were trying to specify
19 though that really interested in battery storage
20 that's interconnected at transmission as opposed to
21 if it's interconnected at distribution for certain
22 parts of the reporting requirements. So hopefully
23 that was clear in our written comments.

24 JUDGE DIPPELL: Okay. Thank you,
25 Ms. Eubanks. Any other responses or comments? All

1 right. Then looks like that will conclude the
2 rulemaking hearing. We can adjourn. Thank you. Go
3 off the record.

4 (Off the record at 10:20 a.m..)

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1 CERTIFICATE OF REPORTER

2 STATE OF MISSOURI)

3 COUNTY OF CALLAWAY)

4 I, Shelley L. Bartels, a Certified Court
5 Reporter, CCR No. 679, do hereby certify that I was
6 authorized to and did stenographically report the
7 transcript of proceedings; and that the foregoing
8 transcript, pages 1 through 15, is a true record of
9 my stenographic notes.

10 I FURTHER CERTIFY that I am not a relative,
11 employee, or attorney, or counsel of any of the
12 parties, nor am I a relative or employee of any of
13 the parties' attorney or counsel connected with the
14 action, nor am I financially interested in the
15 action.

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17 DATED this 13th day of October, 2024.

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Shelley L. Bartels, CCR 679

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