

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

In The Matter of a Determination of Special	)	
Contemporary Resource Planning Issues to	)	
Be Addressed by Ameren Missouri in its	)	<u>File No. EO-2017-0073</u>
Next Triennial Compliance Filing or Next	)	
Annual Update Report	)	

**STAFF’S SUGGESTED SPECIAL CONTEMPORARY RESOURCE
PLANNING ISSUES FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI**

COMES NOW the Staff of the Missouri Public Service Commission (“Commission”), by and through counsel, and, pursuant to 4 CSR 240-22.080(4), and for its response to the Commission’s September 9, 2016 *Order Opening A File Regarding Special Contemporary Resource Planning Issues And Offering An Opportunity To File Suggestions*, requests the Commission include the issues indicated below in the list of special contemporary resource planning issues the Commission orders Ameren Missouri to analyze and document in Ameren Missouri’s triennial compliance filing to be filed with the Commission on October 1, 2017, pursuant to 4 CSR 240-22.080(1)(A) and 22.080(4).

1. Commission Rule 4 CSR 240-22.010(2) states, in part, that the “fundamental objective of the resource planning process at electric utilities shall be to provide the public with energy services that are safe, reliable, and efficient, at just and reasonable rates, in compliance with all legal mandates, and in a manner that serves the public interest and is consistent with state energy and environmental policies.” With this rule in mind, the Staff proposes the following special contemporary resource planning issues for Ameren Missouri.

2. The Staff's suggested special contemporary issues for Ameren Missouri's triennial compliance filing on October 1, 2017 are as follows:

- A. Include the following as uncertain factors that may be critical to the performance of alternative resource plans in accordance with 4 CSR 240-22.060(5)(M):
 - (1) Foreseeable emerging energy efficiency technologies;
 - (2) Foreseeable energy storage technologies; and
 - (3) Foreseeable distributed generation, including but not limited to, distributed solar generation, combined heat and power (CHP), and micro-grid formation.
- B. Document Ameren Missouri's most recent economic analysis for its system-wide implementation of AMI meters. Provide projected implementation dates and annual budget for AMI implementation and include the capital and operating cost impacts in the integrated resource analysis.
- C. Analyze and document the future capital and operating costs faced by each Ameren Missouri coal-fired generating unit in order to comply with the following environmental standards:
 - (1) Clean Air Act New Source Review provisions;
 - (2) 1-hour Sulfur Dioxide National Ambient Air Quality Standard;
 - (3) National Ambient Air Quality Standards for ozone and fine particulate matter;
 - (4) Cross-State Air Pollution Rule, in the event that the rule is reinstated;
 - (5) Mercury and Air Toxics Standards;
 - (6) Clean Water Act Section 316(b) Cooling Water Intake Standards;
 - (7) Clean Water Act Steam Electric Effluent Limitation Guidelines;
 - (8) Coal Combustion Waste rules;
 - (9) Clean Air Act Section 111(d) Greenhouse Gas standards for existing sources;

- (10) Clean Air Act Regional Haze requirements; and
- (11) Clean Power Plan.

- D. Analyze and document the cost of any transmission grid upgrades or additions needed to address transmission grid reliability, stability, or voltage support impacts that could result from the retirement of any existing Ameren Missouri coal-fired generating unit in the time period established in the IRP process.
- E. In the event Noranda's expected annual coincident peak demand is less than 100 MW prior to the planned retirement of the Meramec generating plant, develop and analyze at least one alternative resource plan which accelerates the retirement of the Meramec generating plant and, if necessary, additional older generating units such that Ameren Missouri's capacity position after meeting all MISO reserve requirements is less than 10% in each year of the 20-year planning horizon.
- F. Analyze and document the impact of electric vehicle usage for the 20-year planning period upon the high-case load forecasts when complying with 4 CSR 240-22.060(5)(A).
- G. Review the options available to Ameren Missouri for providing customer financing for energy efficiency measures. Discuss Ameren Missouri's current, near term (next three years) and long term activities and plans for providing customer financing for energy efficiency measures.

WHEREFORE, the Staff recommends the Commission adopt the above listed special contemporary resource planning issues in its order that contains the list of special contemporary resource planning issues for Ameren Missouri to analyze and document in its October 1, 2017 triennial compliance filing, pursuant to 4 CSR 240-22.080(1)(A) and 22.080(4).

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered or transmitted by facsimile or electronic mail to all counsel of record this 15th day of September, 2016.

/s/ Robert S. Berlin