

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

In the Matter of the Determination of Special)	
Contemporary Resource Planning Issues to be)	
Addressed by The Empire District Electric)	<u>File No. EO-2018-0048</u>
Company in its Next Triennial Compliance)	
Filing or Next Annual Update Report)	

**STAFF SPECIAL CONTEMPORARY ISSUES FILING IN RESPONSE TO
COMMISSION ORDER OF AUGUST 14, 2017 AND 4 CSR 240-20.080(4)(A)**

COMES NOW the Staff of the Missouri Public Service Commission in response to the Missouri Public Service Commission's August 14, 2017 *Order Opening a File Regarding Special Contemporary Resource Planning Issues and Offering an Opportunity to File Suggestions*. In support thereof, the Staff files its response and states as follows:

1. 4 CSR 240-22.080(4)(A) states: "No later than September 15, staff, public counsel, and parties to the last triennial compliance filing of each utility may file suggested special contemporary issues for each utility to consider."

2. 4 CSR 240-22.020(55) states:

Special contemporary issues means a written list of issues contained in a commission order with input from staff, public counsel, and intervenors that are evolving new issues, which may not otherwise have been addressed by the utility or are continuations of unresolved issues from the preceding triennial compliance filing or annual update filing. Each utility shall evaluate and incorporate special contemporary issues in its next triennial compliance filing or annual update filing.

3. The Staff requests that the Commission include the issues A, B, and C set out below in the list of special contemporary resource planning issues which the Commission is to order by no later than November 1, 2017, that The Empire District Electric Company ("Empire") analyze and document in its annual update filing to be

made with the Commission in March 2018,¹ pursuant to 4 CSR 240-22.080(1), (3) and (4):

- A. Document Empire's most recent economic analysis for its system-wide implementation of AMI meters. Provide projected implementation dates and annual budget for AMI implementation.
- B. When complying with 4 CSR 240-22.060(5)(A), analyze and document the impact of electric vehicle usage for the 20-year planning period upon the high-case load forecasts.
- C. 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 coal-fired generating unit in the time period established in the IRP process.

4. So as to give Empire additional planning time, the Staff requests that the Commission include the issues D set out below in a list of special contemporary resource planning issues which the Commission orders also by no later than November 1, 2017, that Empire is to analyze and document in its next triennial compliance filing to be made with the Commission on April 1, 2019, pursuant to 4 CSR 240-22.080(1), (2) and (4):

- D. For Empire's next triennial compliance filing, 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):
 - (i) Foreseeable demand response technologies, including but not limited to, integrated energy management control systems, linking smart thermostats, lighting controls and other load-control technologies with smart end-use devices;
 - (ii) Foreseeable energy storage technologies; and
 - (iii) Foreseeable distributed energy resources, including but not limited to, distributed solar generation, distributed wind generation, combined heat and power (CHP), and microgrid formation.

¹ 4 CSR 240-22.080(3)(B) states in part that on or about April 1 of every year in which the electric utility is not required to submit a triennial compliance filing, each electric utility shall host an annual update workshop with the stakeholder group. The annual update report is to be filed with the Commission by the electric utility no less than twenty (20) days before the annual update workshop. 4 CSR 240-22.080(3)(C) addresses filings after the annual update workshop.

The fact that the Staff is making this request now in 2017 regarding a triennial compliance filing scheduled to occur on April 1, 2019 is not intended to indicate that the Staff will not have on September 15, 2018, or some other appropriate time, additional special contemporary resource planning issues to request that the Commission order Empire address in its next triennial compliance filing.

WHEREFORE the Staff requests that the Commission adopt the above list of special contemporary resource planning issues in its order(s) to be issued no later than November 1, 2017, that contains (1) the list of special contemporary resource planning issues for Empire to analyze and document in its 2018 annual update filing to be made with the Commission in March 2018, pursuant to 4 CSR 240-22.080(1), (3) and (4), and (2) certain special contemporary resource planning issues for Empire to analyze and document in its next triennial compliance filing to be made with the Commission on April 1, 2019, pursuant to 4 CSR 240-22.080(1), (2) and (4).

Respectfully submitted,

/s/ Steven Dottheim

Steven Dottheim, Mo. Bar #29149
Chief Deputy Staff Counsel
(573) 751-7489 (Telephone)
steve.dottheim@psc.mo.gov (E-mail)

Nathan Williams, Mo. Bar # 35512
Deputy Staff Counsel
(573) 751-8702 (Telephone)
nathan.williams@psc.mo.gov (E-mail)

Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102
(573) 751-9285 (Fax)
**Attorneys for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 15th day of September, 2017.

/s/ Steven Dottheim