

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 KCP&L Greater Missouri Operations)
Company in its Next Triennial Compliance Filing)
or Next Annual Update Report)

File No. EO-2016-0039

LIST OF SUGGESTED SPECIAL CONTEMPORARY ISSUES OF SIERRA CLUB

Pursuant to 4 CSR 240-22.080(4), Sierra Club hereby recommends the following as special contemporary issues for consideration and analysis by Kansas City Power & Light Greater Missouri Operations (“GMO”).

1. Analyzing and documenting the future capital and operating costs faced by each GMO coal-fired generating unit in order to comply with all existing, pending, or potential environmental standards, including:
 - a. Clean Air Act New Source Review provisions;
 - b. 1-hour Sulfur Dioxide National Ambient Air Quality Standard;
 - c. National Ambient Air Quality Standards for ozone and fine particulate matter;
 - d. Cross-State Air Pollution Rule, including the anticipated 2016 update to the rule to incorporate interstate transport requirements for the 2008 ozone National Ambient Air Quality Standard;
 - e. Mercury and Air Toxics Standards;
 - f. Clean Water Act Section 316(b) Cooling Water Intake Standards;
 - g. Clean Water Act Steam Electric Effluent Limitation Guidelines;
 - h. Coal Combustion Waste rules;

- i. Clean Air Act Section 111(d) Greenhouse Gas standards for existing sources; and
 - j. Clean Air Act Regional Haze requirements.
2. Analyzing and documenting 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 GMO coal-fired generating unit;
3. Analyzing and documenting on a unit-by-unit basis the net present value revenue requirement of the relative economics of continuing to operate each GMO coal-fired generating unit versus retiring and replacing each such unit in light of all of the environmental, capital, fuel, and O&M expenses needed to keep each such unit operating as compared to the cost of other demand-side and supply side resources;
4. Analyzing and documenting the technical, maximum achievable, and realistic achievable energy and demand savings from demand-side management, and incorporating each level of savings into GMO's resource planning process;
5. Analyzing and documenting cost and performance information sufficient to fairly analyze and compare utility scale wind and solar resources, including distributed generation, to other supply side alternatives; and
6. Analyzing the impact of emerging energy efficiency technologies throughout the planning period.

Date: September 15, 2015

Respectfully submitted,

/s/ Henry Robertson

Henry B. Robertson
Great Rivers Environmental Law Center
705 Olive Street, Suite 614
St. Louis, MO 63101
(314) 231-4181

hrobertson@greatriverslaw.org

Attorney for Sierra Club

Of counsel:

Sunil Bector
Associate Attorney
Sierra Club Environmental Law Program
85 Second Street, Second Floor
San Francisco, CA 94105-3441
(415) 977-5759
sunil.bector@sierraclub.org

Thomas Cmar
Staff Attorney
Earthjustice
1101 Lake Street, Ste. 405B
Oak Park, IL 60301
(312) 257-9338
tcmar@earthjustice.org

CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS
and sent by email on this 15th day of September, 2015, to all counsel of record.

/s/ Henry Robertson
Henry Robertson