

| Stakeholder | Proposed Rule Reference | Recommended Change | Summary of Comment | Staff Response |
|-----------------|--------------------------|---|---|--|
| Ameren Missouri | 20 CSR 4240-23.040(1)(J) | None | Regarding the definition of “demand-side resources”, no specific MW value is reported to MISO, but Ameren Missouri is capable of supplying the information to the Commission. | Since Ameren Missouri has stated that it is able to provide the information, Staff does not recommend any changes based on this comment. |
| Ameren Missouri | 20 CSR 4240-23.040(1) | - Add a definition for “contracted capacity resources” - Add a definition for “company owned capacity resources” | A definition should be added for “contracted resources”. | Staff agrees with this comment. The term “company owned capacity resources” should also be defined. “Company owned capacity resource means a capacity resource for which an electrical corporation has an ownership stake for a portion or all of the accredited capacity” “Contracted capacity resource means a capacity resource for which an electrical corporation has an agreement for a portion or all of the accredited capacity” |

| Stakeholder | Proposed Rule Reference | Recommended Change | Summary of Comment | Staff Response |
|-----------------|--------------------------|------------------------------------|---|---|
| Ameren Missouri | 20 CSR 4240-23.040 | None | The rule should provide clarity regarding future capacity purchases and how they should be included in the SRM Reporting Template. If additional capacity was needed, Ameren Missouri would first try to procure the capacity bilaterally, which it would report in Exhibit 6 Contracted Resources. If additional capacity was bought in the MISO PRA, Ameren Missouri would report this in row 44 of Exhibit 3 Planning Resources. | Staff agrees with Ameren Missouri’s explanation of how it would report the additional capacity in the SRM Reporting Template. Therefore, it does not appear that clarification in the rule language is necessary. |
| Evergy | 20 CSR 4240-23.040(1)(J) | None | The definition of “demand-side resources” should be removed because the term is not used in the proposed rule or SRM Reporting Template. | The term “demand-side resources” is used in a note on Exhibit 2 Forecast Demand. |
| Evergy | 20 CSR 4240-23.040(1)(K) | - Revise the definition of “demand | Revise the definition of “demand response resources” to better reflect how SPP and MISO approach demand response. | Staff does not oppose adding the first sentence suggested by Evergy. However, the second sentence appears to be attempting to define |

| Stakeholder | Proposed Rule Reference | Recommended Change | Summary of Comment | Staff Response |
|-------------|---------------------------|---|--|---|
| | | response resources” | Specifically, two sentences should be added to the end of the definition: “Demand response is the quantified impact reduction of electricity consumption, across one or more customer sites deployed in response to system reliability needs or an economic price signal. Demand Response measurement requires metering and baselines to ensure that load reductions are real, quantifiable, and eligible to participate alongside traditional supply resources.” | how demand response is measured. Staff’s position is that this is unnecessary for the definition of “demand response resources”. The requirements for measurement of demand response resources considered in resource adequacy determinations are set by the appropriate RTO/ISO, and can be different between RTO/ISOs, so the definition should remain flexible to accommodate any differences. |
| Eversource | 20 CSR 4240-23.040(1)(II) | - Revise the definition of “transmission losses”, if no objections from other electrical corporations | Revise the definition of “transmission losses” to better align with the calculation of actual transmission losses. | Electrical corporations may get values for transmission losses differently for the purposes of resource adequacy, so the definition of “transmission losses” in the proposed rule was meant to be flexible to allow for these differences. If other electrical |

| Stakeholder | Proposed Rule Reference | Recommended Change | Summary of Comment | Staff Response |
|-------------|-------------------------|--------------------|---|--|
| | | | | <p>corporations do not object to Evergy’s proposed revisions, Staff does not oppose the revisions.</p> |
| Evergy | 20 CSR 4240-23.040(3) | None | <p>Subsections (3)(B) and (3)(C) should be revised to remove exact dates by which electrical corporations in SPP shall submit an SRM Reporting Template to allow flexibility for anticipated changes in SPP related to submission dates and any future changes SPP makes to planning seasons or submission deadlines.</p> | <p>Staff’s position is that specific dates by which SRM Reporting Templates shall be submitted should be kept in the rule. The dates in the rule can be updated in future rulemakings if an RTO/ISO changes submission dates.</p> |
| Renew | 20 CSR 4240-23.040(3) | None | <p>The information reported pursuant to the SRM rule, with appropriate treatment of confidential information, should be filed in a manner that is accessible to all appropriate stakeholders, similar to current reporting requirements for capital investment plans, renewable energy standard</p> | <p>Staff’s position is that submission of the SRM Reporting Template under the proposed SRM rule should be separate from filings under the future IRP rules. Staff intend that submissions of the SRM Reporting Template will be non-case submissions in EFIS, rather than in a case docket. The general public is able to view non-case</p> |

| Stakeholder | Proposed Rule Reference | Recommended Change | Summary of Comment | Staff Response |
|--------------|------------------------------|---|---|--|
| | | | <p>compliance, and other similar annual reporting. Alternatively, the information reported pursuant to the SRM rule should be transmitted, with appropriate safeguards for confidential information, as part of the integrated resource planning (“IRP”) process, to appropriate stakeholders. Renew suggests that this can be accomplished by including the information in the minimum filing requirements of the future, new IRP rules.</p> | <p>submissions in EFIS, except for confidential and highly confidential attachments. The designation of confidential information is covered by 20 CSR 4240-2.135.</p> |
| <p>Renew</p> | <p>20 CSR 4240-23.040(1)</p> | <ul style="list-style-type: none"> - Add a definition for “contracted capacity resources” - Add a definition for “company owned capacity resources” | <p>Renew supports the comments by Ameren Missouri regarding the need for a definition for “contracted resources”.</p> | <p>Staff agrees with this comment. The term “company owned capacity resources” should also be defined.</p> <p>“Company owned capacity resource means a capacity resource for which an electrical corporation has an ownership</p> |

| Stakeholder | Proposed Rule Reference | Recommended Change | Summary of Comment | Staff Response |
|-------------|--|---|---|---|
| | | | | <p>stake for a portion or all of the accredited capacity”</p> <p>“Contracted capacity resource means a capacity resource for which an electrical corporation has an agreement for a portion or all of the accredited capacity”</p> |
| OPC | 20 CSR 4240-23.040(1)(A) | - Revise the definition for “accredited capacity” | Add the word “appropriate” before “regional transmission organization or independent system operator” to match the term defined in the rule and in the statute. | Staff agrees with this suggestion. |
| OPC | 20 CSR 4240-23.040(1)(E), (N), (R), (BB), (DD), and (JJ) | - Remove the definition for BESS | Remove definitions that are not used in the proposed rule or the SRM Reporting Template. The terms OPC suggests removing are: “battery energy storage system (BESS)”, “effective load carrying capability (ELCC)”, “installed capacity (ICAP)”, “pumped storage hydroelectric system”, “seasonal accredited | The terms ELCC, ICAP, SAC, and UCAP are included as dropdown options for accreditation methodologies in the SRM Reporting Template. Thus, those definitions should remain in the proposed rule. The term “pumped storage hydroelectric system” is included in the definition of |

| Stakeholder | Proposed Rule Reference | Recommended Change | Summary of Comment | Staff Response |
|-------------|--------------------------|---|--|---|
| | | | capacity (SAC)”, and “unforced capacity (UCAP)”. | <p>“resource type” and should also be kept in the proposed rule.</p> <p>Staff agrees that the term “battery energy storage system (BESS)” may be removed.</p> |
| OPC | 20 CSR 4240-23.040(1)(H) | <ul style="list-style-type: none"> - Revise the term “energy storage system” to “energy storage system (ESS) resource” - Revise the definition of “capacity resource” to use the new term | Modify the reference to “energy storage resource” in the definition of “capacity resource” to “energy storage system” to match the term that is defined in the proposed rule. | Staff agrees that the term should be revised for consistency. Staff is recommending changing the term “energy storage system” to “energy storage system (ESS) resource” and using that term in the definition of “capacity resource”. |
| OPC | 20 CSR 4240-23.040(1)(J) | - Revise the definition for “demand-side resources” | Clarify or strike the definition for “demand-side resources”. The proposed definition does not identify what demand-side resources are. The term is only used once in a note in Exhibit 2 of the SRM Reporting Template. | Staff does not oppose adding the wording “that reduce or shift demand” to the definition. However, the wording should be added earlier in the definition rather than at the end. Additionally, the term “demand-side resources” |

| Stakeholder | Proposed Rule Reference | Recommended Change | Summary of Comment | Staff Response |
|-------------|--------------------------|--|---|--|
| | | | <p>The phrase “that reduce or shift demand” should be added to the end of the definition. It is not possible to measure the effectiveness of demand-side programs until after they have been implemented, which makes forecasting difficult and problematic. It would be prudent to exclude demand-side resource from resource adequacy calculations covered by the proposed rule. To accomplish this, the definition for “demand-side resources” could be removed from the proposed rule and the SRM Reporting Template.</p> | <p>should be kept in the proposed rule. OPC states that there are difficulties with forecasting demand-side resources, but Staff’s position is that demand-side resources must be included in reporting to get a full resource adequacy picture.</p> <p>“Demand-side resource means a resource or program that reduces or shifts demand that is included in resource adequacy determinations submitted to the appropriate RTO/ISO and may be considered a capacity resource in accordance with the rules of the appropriate RTO/ISO or may be included in an electrical corporation’s peak forecast but not both”</p> |
| OPC | 20 CSR 4240-23.040(1)(M) | - Revise the term “distribution system losses” | Revise the term “distribution system losses” to “distribution losses”, because it is not used in | Staff agrees with this comment. |

| Stakeholder | Proposed Rule Reference | Recommended Change | Summary of Comment | Staff Response |
|-------------|---------------------------|---|---|---|
| | | to “distribution losses” | the proposed rule or SRM Reporting Template. “Distribution losses” is used in the SRM Reporting Template. | |
| OPC | 20 CSR 4240-23.040(1)(FF) | - Add a definition for “planning reserve margin” | Add “required capacity” after “planning reserve margin” so that the defined term “planning reserve margin required capacity” is used instead of the undefined term “planning reserve margin” in the definition for “sufficient capacity”. | The term “sufficient capacity” is defined in 393.1080, RSMo. Therefore, the definition for the term “sufficient capacity” should not be revised. A definition for “planning reserve margin” is being recommended in response to other stakeholder comments. |
| OPC | 20 CSR 4240-23.040(1)(KK) | - Revise the term “winter season” to “winter planning season” | Modify the defined term “winter season” to “winter planning season” to match the term used in subsection (3)(B). | Staff agrees with this comment. |