

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

In the Matter of the Proposed Rule 20 CSR)
4240-23.040 State Reliability Mechanism) **File No. EX-2026-0171**
(SRM))

STAFF’S RESPONSE TO COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) hereby submits its Staff’s Response to Comments and states as follows:

1. On March 24, 2026, Staff submitted its comments in support of the proposed rule 20 CSR 4240-23.040, published in the Missouri Register dated February 17, 2026, along with a revision to the rule to reflect an edit to the SRM Reporting Template.

2. On March 25, 2026, the Office of Public Counsel (“OPC”), Renew Missouri (“Renew”), Evergy Missouri (“Evergy”), and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) submitted comments in regards to the proposed rule and the SRM Reporting Template.

3. Staff has reviewed all of the comments submitted by those listed in paragraph two and developed a response to the same as outlined in the attached documents: Attachments A, B, C, and D, which are incorporated by reference herein. Attachment A provides responses to comments on the proposed rule, Attachment B provides responses to comments on the SRM Reporting Template, Attachment C provides the proposed rule with Staff’s collective recommended revisions, and Attachment D provides the SRM Reporting Template updated with Staff’s recommended revisions.

SRM Rule

4. In addition to revisions to the proposed rule in direct response to filed stakeholder comments discussed in Attachment A, Staff is recommending the following revisions: 1) Add a definition for “generation resources” because this term is used in the definition for “capacity resources”, 2) Change the term “planned resource” to “planned capacity resource” for clarity, 3) Update the revision date for the SRM Reporting Template in Section (2), 4) Minor wording changes for consistency, and 5) Adjust subsection numbers in Section (1) to align with added and removed definitions.

SRM Reporting Template

5. In addition to revisions to the SRM Reporting Template in direct response to filed stakeholder comments discussed in Attachment B, Staff is recommending the following revisions: 1) Update references to “owned generation resources” to “owned capacity resources” to be consistent with Exhibit 3 and the definition Staff is recommending to add to the proposed rule, 2) Update references to “contracted generation resources” to “contracted capacity resources” to be consistent with Exhibit 3 and the definition Staff is recommending to add to the proposed rule, and 3) Adding notes to Exhibits 5, 6, and 7 that demand response resources will be accounted for in Exhibit 4.

WHEREFORE, Staff respectfully submits these responsive comments for the Commission’s consideration and supports the proposed rule 20 CSR 4240-23.040.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 2nd day of April, 2026.

/s/ J. Scott Stacey