

IRP Rules Workshop

April 16, 2026



Agenda

Welcome

Overview of Senate Bill 4 and Section 393.1900 RSMo

IRP Rule Development - Strategies and Decision-Making Process

Review of IRP Process Flow Charts

IRP Best Practices

Review of 21.020 Filing Schedule, Filing Requirements, and IRP Proceeding

Overview of Commission's IRP Roadmap

Open Discussion

Closing

Welcome



Chair Kayla Hahn

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Senate Bill 4: Relating to Utilities

Omnibus Utilities Bill

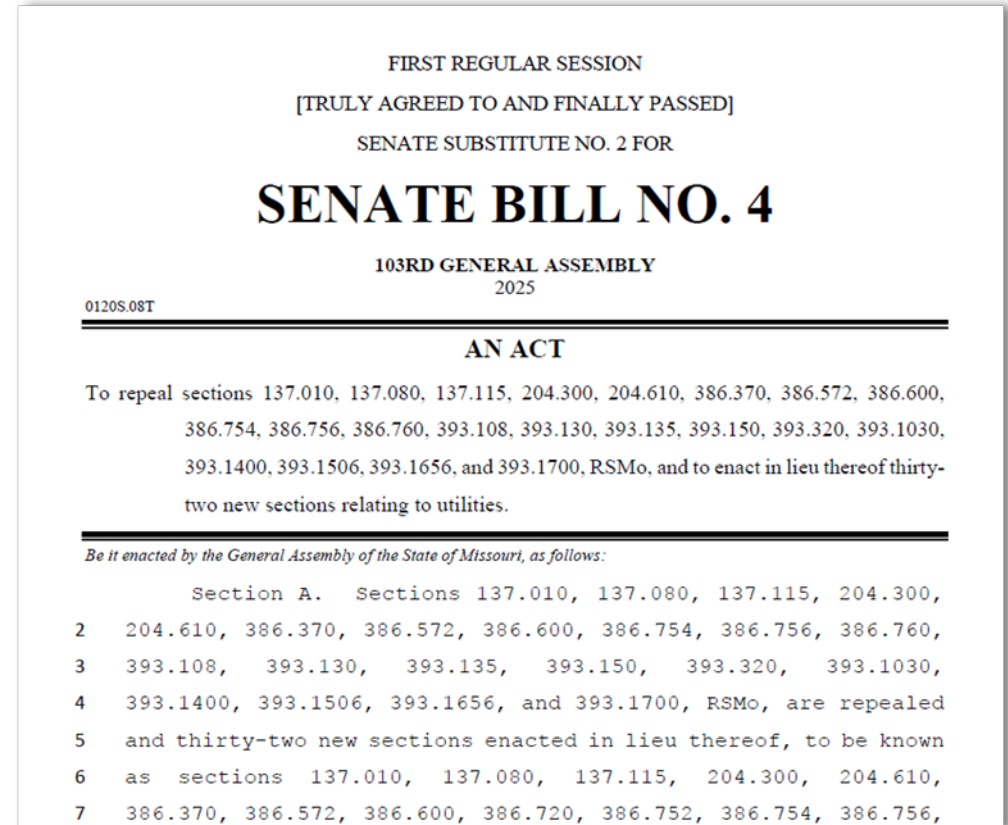
Contains 26 provisions relating to utilities

Passed by the Missouri Senate on February 24, 2025

Passed by the Missouri House on March 13, 2025

Signed by the Governor on April 9, 2025

Provisions effective August 28, 2025 unless otherwise specified



3 Part Solution Driven by Discussions in 2024

Establish a State Reliability Mechanism

- Improve Data Collection and Understanding
- Increase Accountability
- Ensure Safe and Reliable Service

Integrated Resource Planning Reform

- Move from Static to Dynamic Approach
- Embrace Forward Looking Perspective
- Balance Incentives and Penalties – “Carrots & Sticks”

Accounting Treatment Reform

- “Steel in the Ground”
- Deliver Safe and Reliable Service
- Ensure Consumer Protections

14 Key Provisions relating to Energy in SB4

393.1900 RSMo - Reform Missouri's Integrated Resource Plan process

393.108 RSMo - Establish a State Reliability Mechanism

393.135 RSMo - Reform accounting treatment for new gas generation construction

393.130 RSMo - Require the establishment of Large Load Tariffs

386.370 RSMo - Modify assessment to support Public Service Commission operations

386.720 RSMo - Establish assessment to support Office of the Public Counsel operations

393.1400 RSMo - Allow "Plant in Service Accounting" for new gas construction

393.401 RSMo - Establish a "Watt for Watt" requirement to replace retiring dispatchable generation

393.108 RSMo - Modify statutory Hot Weather Rule

393.109 RSMo - Establish statutory Cold Weather Rule

393.1680 RSMo - Allow creation of special rates or programs based on utility burden

386.1100 RSMo - Require electric IOUs to offer a traditional electric rate in addition to any "Time-of-Use" rates

386.820 RSMo - Establish process for customers to "opt-out" of Advanced Meters

393.138 RSMo - Allow federal income tax cut pass through to rates

Rulemaking Status on Energy Provisions

	Status of Formal Rulemaking
393.1900 RSMo - Reform Missouri's Integrated Resource Plan process	Pre-Formal rulemaking phase EW-2026-0091
393.108 RSMo - Establish a State Reliability Mechanism	In Progress
393.401 RSMo - Establish a "Watt for Watt" requirement to replace retiring dispatchable generation	In Progress
393.108 RSMo - Modify statutory Hot Weather Rule	Completed
393.109 RSMo - Establish statutory Cold Weather Rule	Completed
393.1680 RSMo - Allow creation of special rates or programs based on utility burden	OW-2026-0085
386.820 RSMo - Establish process for customers to "opt-out" of Advanced Meters	Completed

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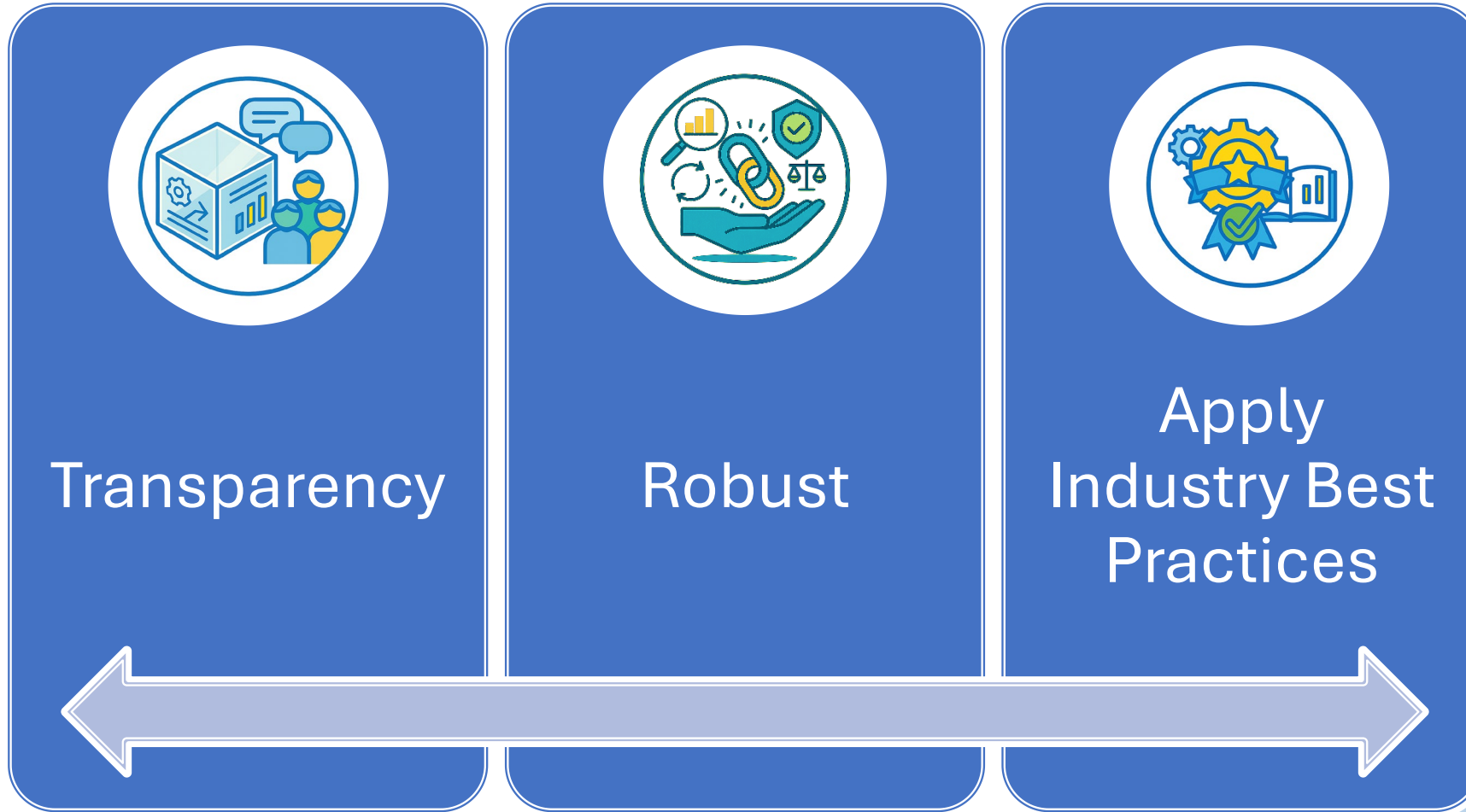
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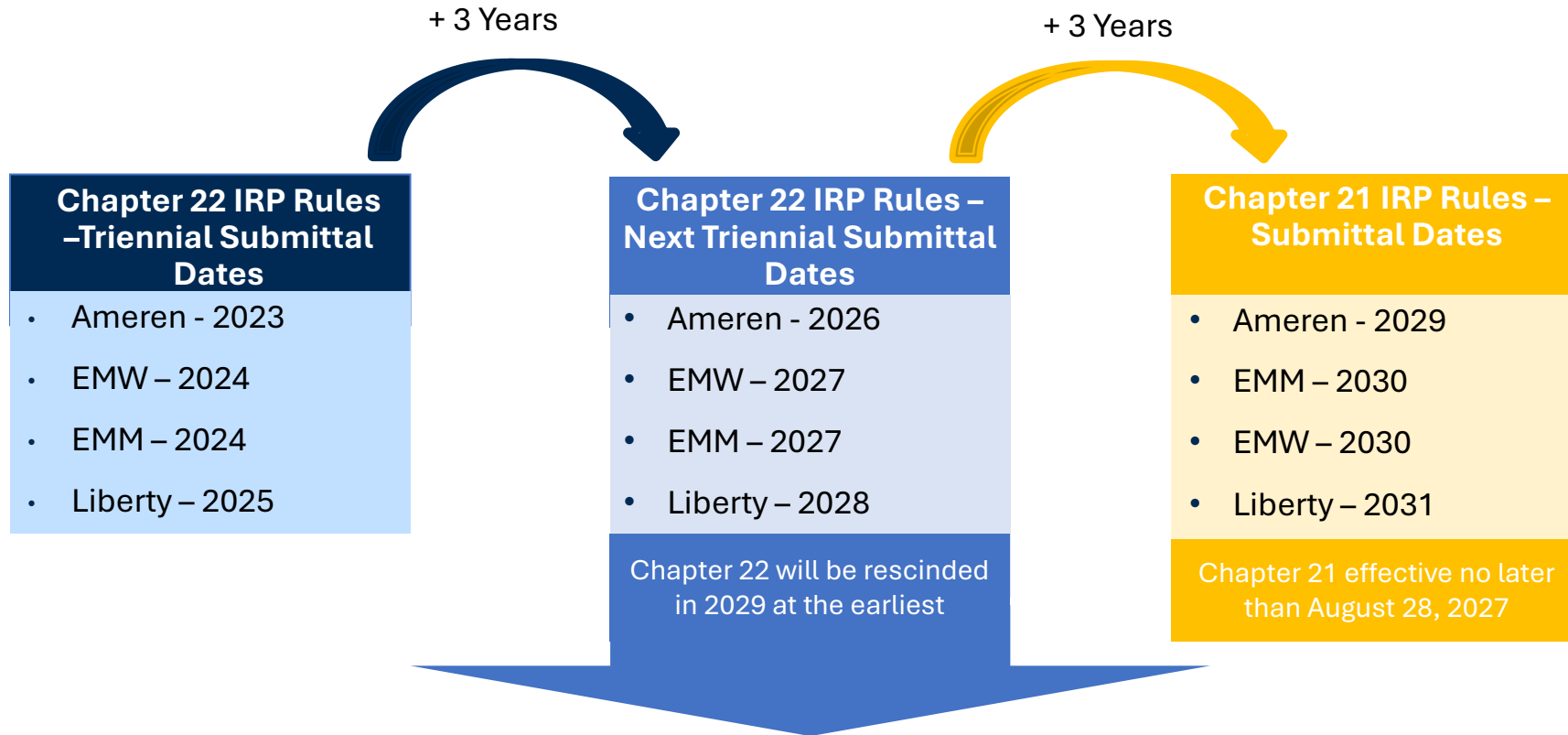
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Foundation to Our IRP Development



Transition from Chapter 22 to Chapter 21



Chapter 22 will be in place concurrently with proposed Chapter 21 until the process with Liberty’s 2028 IRP under Chapter 22 is completed.

A Quick Preview of the Development of Chapter 21

393.1900 RSMo

Chapter 22

Eliminated

Simplified

Modernized

Added

Chapter 21

IRP Rulemaking Schedule

- ▶ Statute references August 28, 2027 but practical deadline is June 30, 2027
- ▶ Formal rulemaking takes at least 10 months
- ▶ High-level schedule:
 - October 2025 to January 2026 – Internal development of preliminary draft
 - January 6, 2026 – Preliminary draft shared with utilities and OPC
 - February 11, 2026 to March 11, 2026 – Refinement based on feedback
 - March 11, 2026 - Discussion draft filed in EFIS
 - ★ April 2026 - Stakeholder Workshops
 - Mid to late May 2026 – Version 2 filed
 - June 2026 – Written comments
 - Mid to late July 2026 – Final version ready to transition to formal rulemaking

How to Focus Your Feedback

Prioritize Feedback On

- ▶ **Accuracy.** Are key constraints or decision points missing?
- ▶ **Clarity.** Is the intent clear?
- ▶ **Applicability.** Are there areas of the existing rules that we carried forward that are unnecessary, outdated, or break down in practice?
- ▶ **Gaps.** What perspectives are missing or underrepresented?

Deprioritize

- ▶ **Wordsmithing.** Minor wording or rewriting sections without a clear conceptual need or to improve understanding.
- ▶ **Organizational Preferences.** Focusing on a single stakeholder's process without strengthening the common approach or capability.
- ▶ **Scope Creep.** Adding in concepts that fit better in another rule.

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What To Expect

Review Period

- Review the IRP process flow charts
- Write your clarifying questions or solution on a post-in.

Provide Your Input

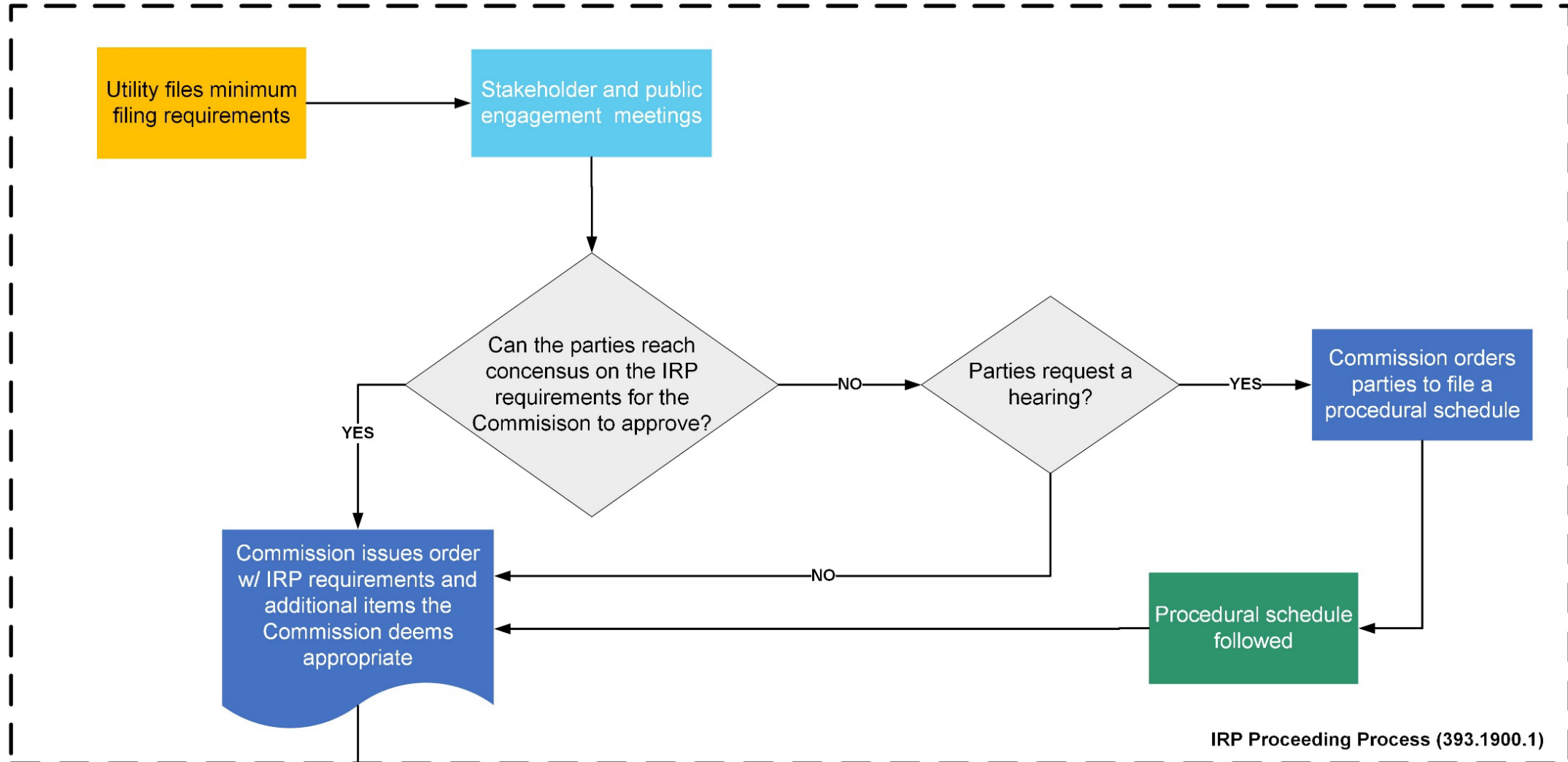
- You will have some additional time after we finish reviewing the IRP process flow charts to get up and look at the charts and write additional questions.

Take a Break

- To compile your questions

Facilitated discussion

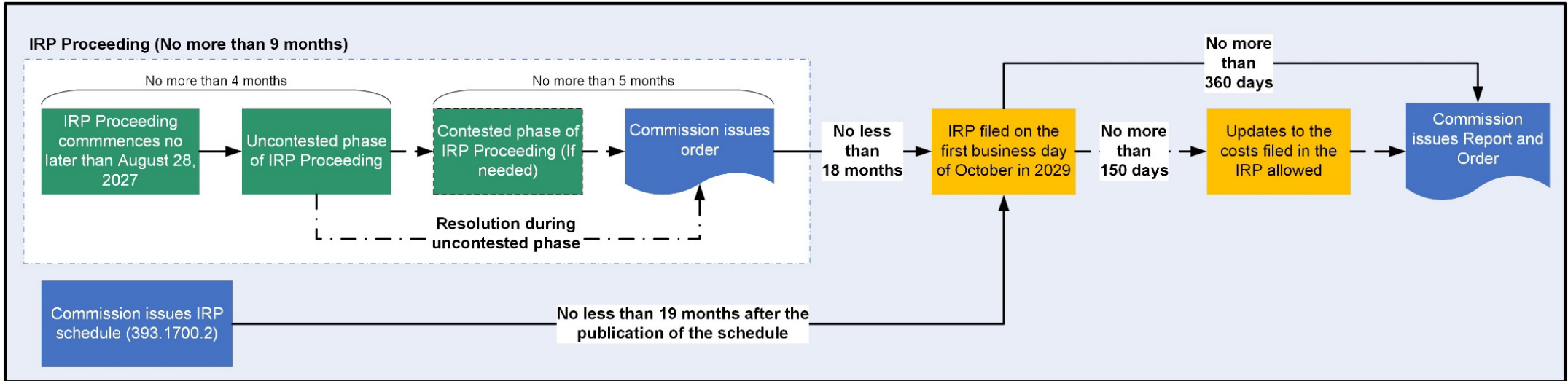
- based on question



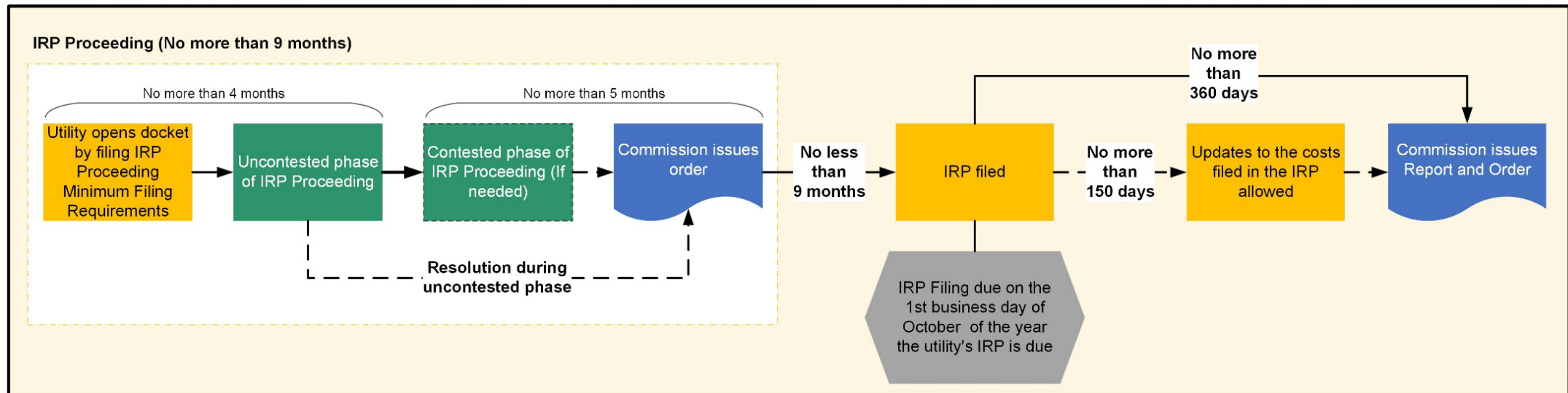
IRP Proceeding Process (393.1900.1)

3
IRP Filing
Process

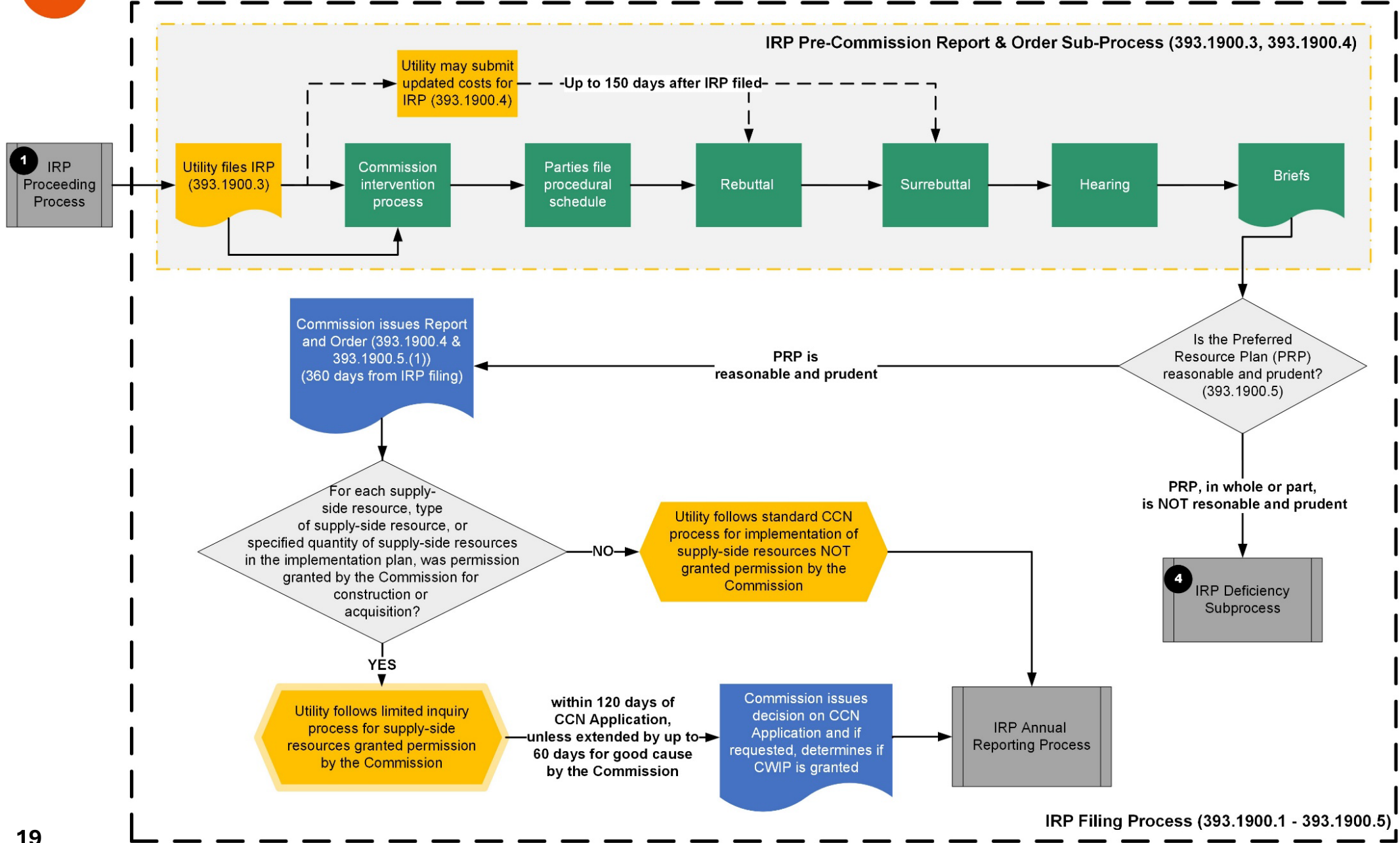
Timeline for the First IRP With or Without a Contested IRP Proceeding

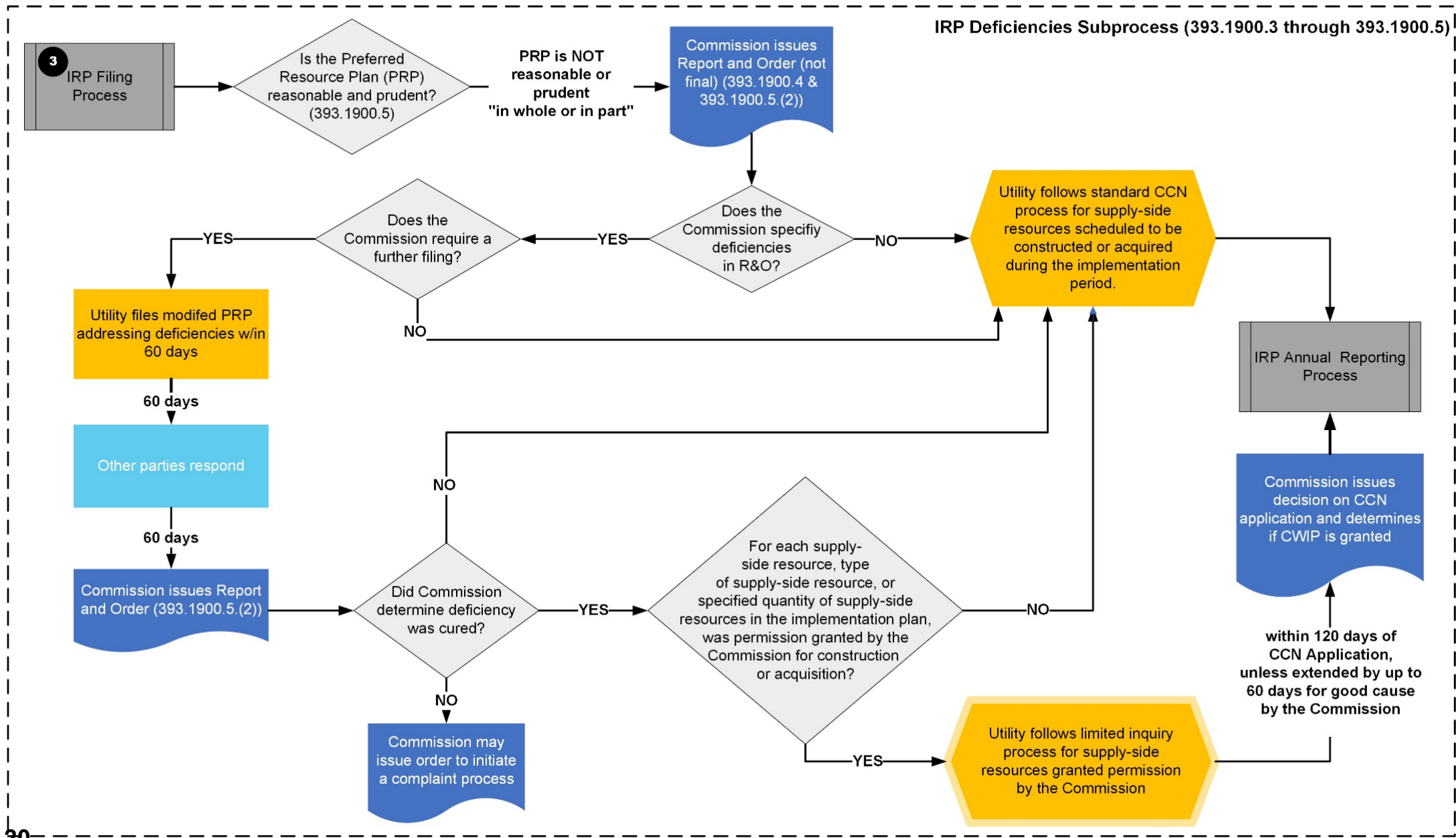


Proposed Ongoing Timeline With or Without a Contested IRP Proceeding



3 IRP FILING PROCESS





Provide Your Input

Use the Post-Its on Your Table



Key Steps

1. Indicate the process flow chart number
2. Write your point of clarification or solutions on the Post-it. **One concept per Post-it please.**
3. Stick the Post-it on the process flow chart.

Break



Review of Process Flow Chart Clarifications & Solutions



Jaime Myers and Travis Pringle

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IRP Best Practices



Juan Pablo “JP” Carvallo, LBNL

Lunch



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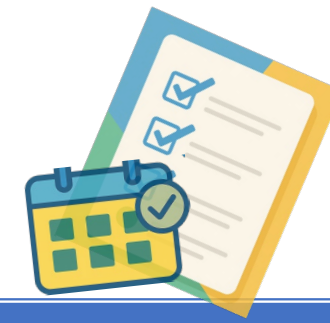
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Pre- IRP Filing Sections

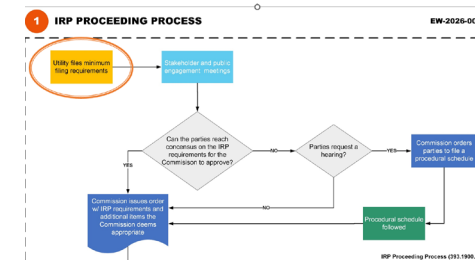


Section 1

- Outlines the schedule for IRP filings for the 4 electric utilities

Section 2

- Outlines the steps included in the IRP proceeding.
- Key requirements
 - Timing of the utility filing information for the stakeholders
 - Public & stakeholder engagement
- Uncontested phase vs contested phase



Section 3

- Defines the IRP proceeding minimum filing requirements

Section 4

- Minimum filing requirements for the IRP

Post-IRP Filing Section



Section 5

- The process for cost updates to the IRP up to 150 days after the IRP is filed
- Notification requirements

Section 6

- Outlines the process of determining if a preferred resource plan is reasonable and prudent (393.1900.5)

Section 7

- Addresses the notification process for changes to the preferred resource plan that was found by the Commission to be reasonable and prudent

What To Expect Next

Breakout Session 1

Reporting & Facilitated Discussion

Breakout Session 2

Reporting & Facilitated Discussion

Breakout Session 1



Discussion Topics

Topic A – Cost Updates to IRP Filing

- Section 5 (A) What is the most accurate and transparent way to define material change in cost?
 - What constitutes a “material change in cost”?
 - How is that best quantified?

Topic B – Timing for IRP Proceeding

- Section (2)(B) requires IRP proceedings occur no less than 18 months prior to the IRP filing date for IRPs, with the exception of the first IRP.
 - IRP Proceeding
 - How long should this be?
 - Max of 9 months as drafted?
 - Shorter? If so, why?
 - Time between IRP Proceeding and IRP Filing
 - How long should this be?
 - 9 months as drafted for subsequent IRP cycles after the first IRP?
 - 18 months for all IRPs as requested by some stakeholders?
 - Or another time frame and why?

Breakout Session 2



Discussion Topics Cont'd

Topic C – Changes Between IRP Proceeding and Filing

- Section (3)-IRP Proceeding minimum filing requirements and Section (4)-IRP filing requirements do not specifically address the circumstance when changes to information between IRP proceeding and filing could impact the commission's ordered direction.
- What is the most transparent way to proceed?
 - Should utilities be required to notify the Commission of any changes or only significant changes?
 - If so, when in the process?
 - What constitutes a significant change?
 - Should any further action be taken after notification?
 - If so, under what process and/or timeline?
- When changes occur, who determines which information should be utilized in the utility's analysis?

Topic D – Changes to Preferred Resource Plans

- Section (7) requires the utility to notify the Commission of any changes/unforeseen events that modify the preferred resource plan.
 - What is the most transparent way to define these changes or unforeseen events that require notification to the Commission?
 - What is the stakeholders' role during this process? Should stakeholders be able to notify the Commission of a perceived change to a PRP?
 - What actions would stakeholders prefer the Commission take upon receiving a notification?
 - If there is a material change to the PRP, should the implementation plan be updated more frequently than annually?

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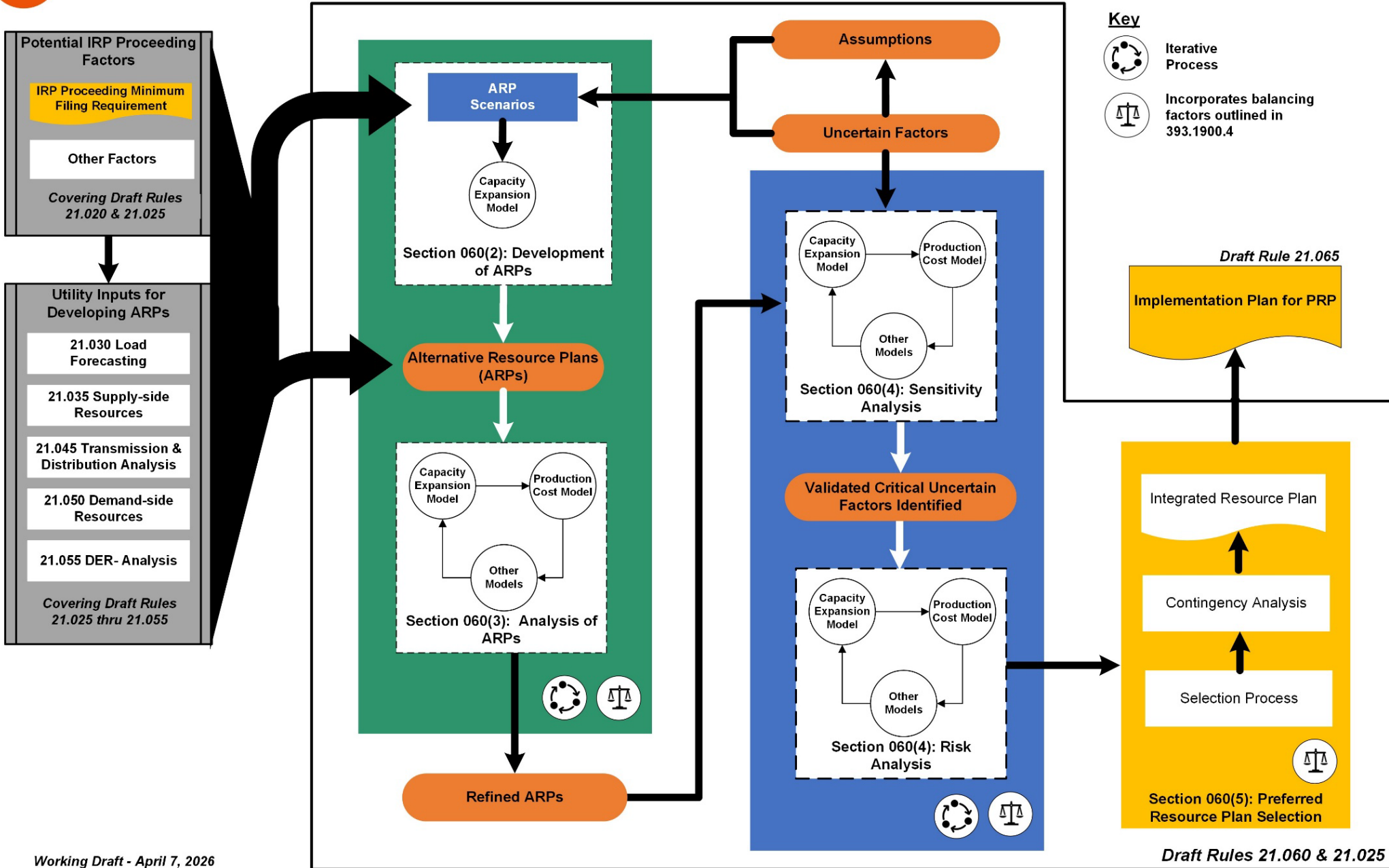
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Next Steps

- ▶ Schedule
 - April 21, 23 and 30 – Technical Sessions
 - Mid to late May 2026 – Version 2 filed
 - June 2026 – Written comments
 - Mid to late July 2026 – Final version ready to transition to formal rulemaking
- ▶ Look out for email from irprules@psc.mo.gov
 - Opportunity to submit additional comments, questions or feedback via Survey Monkey based on the conversation today.

**Thank you for your participation
today!**

