

Stakeholder	Rule Citation	Requested Change	Summary of Comment
OPC	20 CSR 4240-21.010(2)(C)	The commission shall review an electric utility’s integrated resource plan to determine if it appropriately <del>addresses</del> <b>balances all of</b> the balancing factors	Section 393.1900.4 of the Revised Statutes of Missouri requires the Commission to determine whether the integrated resource plan (“IRP”) “appropriately balances all of the following factors.” To ensure consistency between the rule and the statute, the OPC suggests that the language of the rule match the language of the statute.
	20 CSR 4240-21.015(10)	Balancing factors means the factors, as outlined in 20 CSR 4240-21.010(2)(C), that should be balanced in the development of an <del>alternative integrated</del> resource plan.	Section 393.1900.4 of the Revised Statutes of Missouri requires the Commission to determine whether the IRP “appropriately balances all of the following factors,” which match the factors identified in 20 CSR 4240-21.010(2). It is unclear what is meant by referencing only “an alternative resource plan” in the definition of the term “balancing factors,” when § 393.1900.4 RSMo. requires the Commission to determine whether the IRP has appropriately balanced these factors. For consistency between the statute and the rule, the OPC suggests this change.
	20 CSR 4240-21.015(11)	Base-case load forecast means the forecast generated by using the <del>most probable median</del> values, generally those	This definition is inconsistent in that it refers to both “the most probable values” and “those representing a fifty percentile (50%).” To ensure consistency in the

		<p>representing a fifty percentile (50%) probability, for each independent variable contained in a forecast model and based on the electric utility's native forecast adjusted for existing and separately identified existing large load.</p>	<p>definition, the OPC suggests the change from "most probable" to "median." Alternatively, if the Commission would like to refer to "most probable," the OPC suggests changing the reference to "a fifty percentile (50%)" to something higher.</p>
	20 CSR 4240-21.015(13)	<p>Capacity means the maximum capability, <b>measured in megawatts (MW)</b>, to continuously produce and deliver electric power.</p>	<p>The OPC suggests adding a standard unit of measurement to the definition of capacity. This mirrors other definitions that include standard units of measurement, such as avoided demand costs and demand.</p>
	20 CSR 4240-21.015(17)	<p>HDD = the maximum of <b>(65 – T) and</b> or zero (0). Cooling degree-days (CDD) are determined by the formula CDD = the maximum of <b>(T – 65) and</b> or zero (0).</p>	<p>The equations included in the definition of "Degree-days" for determining heating degree-days ("HDD") or cooling degree-days ("CDD") could be clearer. For clarity, the OPC suggests including parentheses and changing the word "and" to "or." As written, it is unclear what the word maximum is referring to and it is not clear how the 0 affects the equation.</p>
	20 CSR 4240-21.015(27)	<p>Econometric methodology means the use of statistical models</p>	<p>The exclusion of "as" appears to be a typographical error. The OPC suggests adding it for readability.</p>

		such <i>as</i> regression models, time series methods, statistically adjusted end use (SAE) models, or hybrid models that integrates end-use determinants with econometric, time-series, or other statistical methods.	
	20 CSR 4240-21.015(29)	Electrification means replacing or converting energy-consuming devices, systems, or processes that use non-electric sources of energy with electrically powered equivalents.	The OPC is concerned with this definition as it suggests a desire to phase out natural gas service.
	20 CSR 4240-21.015(32)	Energy storage system (ESS) means a system capable of capturing energy, storing it, and dispatching the energy back into the bulk power system or the electric utility's distribution system, and accredited by the appropriate RTO/ISO in resource adequacy determinations. ESS may	The OPC is concerned with this definition as it states that an energy storage system ("ESS") can be considered a transmission asset. It is unclear how an ESS can constitute a transmission asset.

		be considered a transmission or generation asset.	
	20 CSR 4240-21.015(34)	End-use measure means an energy-efficiency measure <del>or an energy-management measure.</del>	It is unclear what is meant by “an energy-management measure.” Because this term is not defined and is unclear, the OPC suggests striking this aspect of the definition.
	20 CSR 4240-21.015(72)	Pre-IRP proceeding means the proceeding <del>referenced in § 393.1900.1 RSMo. that is</del> initiated when the electric utility files the pre-IRP minimum filing requirements <del>identified in 20 CSR 4240-21.020(2)(C)</del> and concludes with a commission order specifying the <del>alternative resource plans, scenarios, sensitivities, relevant emerging factors and any other factors</del> items identified in 393.1900.1 RSMo.	The definition as drafted does not reference either the IRP statute, § 393.1900 RSMo., or the rule that identifies the minimum filing requirements for the pre-IRP proceeding. For clarity, the OPC suggests including both.  Further, the definition as drafted includes requirements for the Commission’s Order that are not referenced in § 393.1900.1 RSMo. For ease of reference and to ensure that the rule complies with the statute, the OPC suggests striking the identified factors and including a reference to the statute.
	20 CSR 4240-21.020(2)(B)	The pre-IRP proceeding shall commence forty-five (45) days prior to filing the pre-IRP minimum filing	The rule now requires the pre-IRP proceeding to commence 45 days prior to filing the pre-IRP minimum filing requirements and states what must be

		requirements. To commence the pre-IRP proceeding, the electric utility shall	filed to commence the pre-IRP proceeding. However, it is unclear how this requirement interplays with the 60-day notice requirement of 20 CSR 4240-4.017(1). For instance, should an electric utility file a 60-day notice 105 days prior to filing the pre-IRP minimum filing requirements?
	20 CSR 4240-21.020(2)(B)1	File notice in the docket of the upcoming activities, as outlined in paragraphs (2)(B)34. and (2)(B)56.; and	As drafted, the paragraph refers to “upcoming activities,” but paragraph 3 refers to the commission issuing notice of the case and establishing an intervention deadline, while paragraph 5 refers to the electric utility filing the pre-IRP minimum filing requirements. The OPC believes this should be modified to refer to paragraph 4 (the meeting between the electric utility and stakeholders prior to the filing of the pre-IRP minimum filing requirements) and paragraph 6 (the things that an electric utility must do within 1 month of filing the pre-IRP minimum filing requirements).
	20 CSR 4240-21.020(2)(B)2	Directly notify all intervenors in the electric utility’s most recent general rate case and most recent IRP case of the upcoming activities,	For the same reasons that the OPC suggested these changes for 20 CSR 4240-21.020(2)(B)1, the OPC suggests these changes for this paragraph.

		as outlined in paragraphs (2)(B) <del>34</del> . and (2)(B) <del>56</del> .	
	20 CSR 4240-21.020(2)(B)	<i>Subsection Generally</i>	<p>The OPC suggests reorganizing subsection (2)(B). The final sentence of the subsection, which introduces the following list, states that it will introduce requirements that an electric utility must follow to commence the pre-IRP proceeding (“To commence the pre-IRP proceeding, the electric utility shall:”). However, the list includes items that the Commission must do (<i>i.e.</i> (2)(B)3 and (2)(B)12) and items that will occur after the pre-IRP proceeding is commenced (<i>i.e.</i> (2)(B)4 and (2)(B)6).</p> <p>If the Commission desires to maintain the current (2)(B) as drafted, then the OPC suggests that paragraphs 1 and 2 remain nested beneath that subsection and the remaining paragraphs be pulled out. The OPC further suggests that paragraphs 7-9 become nested beneath paragraph 6, as they appear to be requirements that must be completed within the 1 month window referenced in paragraph 6. It may also be helpful to nest paragraph 11 beneath paragraph 10 as it identifies the possible outcomes that stakeholders may reach</p>

			within the 3 months identified in paragraph 10.
	20 CSR 4240-20.020(3)(C)3.C	The electric utility's preferred resource plan, <b>which</b> shall	As drafted, this subparagraph requires the electric utility to include its preferred resource plan ("PRP") in the executive summary of its IRP. It also introduces the requirements of the PRP. To make clear that the subparagraph not only requires the PRP be included, but also that it introduces the requirements of the PRP, the OPC suggests this slight modification.
	20 CSR 4240-21.020(5)(E)	<del>Unless otherwise ordered by the commission, shall issue an order</del> within sixty (60) days of the electric utility's filing of the notice required in subsection (5)(B); <del>identifying whether and how</del> the limited inquiry <del>shall be un is</del> affected by the filing of the notice for the specified supply-side resources or specified quantities of supply-side resource types that the electric utility identified as remaining materially consistent with the	As drafted this subsection suggests that the Commission can make a decision simply by not addressing the filings. This will create ambiguity in the docket as it will not be clear whether the Commission is making such a determination by not addressing the filings, or if they are simply still considering the filings. It also appears at odds with § 393.1900 RSMo., which grants the Commission additional authority to make decisions throughout the IRP process. For consistency with the statute and to increase clarity, the OPC suggests these changes, which would require the Commission to affirmatively state its decision within 60 days.

		approved preferred resource plan.	
	<i>Previously</i> 20 CSR 4240-20.025(3)(A)2	Directly cited in the relevant sections of the IRP filing or testimony, demonstrating how the data supports the overall analysis and conclusions;	Previously this paragraph required the electric utility to cite its workpapers in the relevant sections of the IRP filing or testimony. It is unclear why this language has been removed. The OPC maintains that it would be helpful to know what workpapers support which testimony or sections of the IRP filing, and, therefore, suggests that it be added back in.
	<i>Previously</i> 20 CSR 4240-20.030(1)(G)	<b>The electric utility shall include data for E</b> existing large load customers, including, but not limited to, data centers, industrial manufacturing facilities, and other customers expected to materially affect system demand and include documentation on assumptions regarding load size, seasonal load shape, timing, and probability.	Previously this subsection appeared to require an electric utility to identify certain information on existing large load customers in completing its Load Forecasting Inputs and Assumptions. It is unclear why this language has been removed. The OPC maintains that it would be helpful to know this information and suggests that it be added back in with the slight modification noted so that it is a complete sentence.
	20 CSR 4240-20.030(5)(A)	The electric utility shall prepare and file a base-case load forecast	Similar to the changes that the OPC suggests for the definition of “base-case load forecast,” the OPC suggests this

		<p>representing the electric utility’s best estimate of future system load under a reasonable scenario, using the <b>most probable median</b> values, generally those representing a fifty percentile (50%) probability, for each independent variable contained in the forecast model and based on the electric utility’s native forecast adjusted for existing and separately identified existing large load.</p>	<p>change to maintain consistency in this subsection. Alternatively, if the Commission would like to refer to “most probable,” the OPC suggests changing the reference to “a fifty percentile (50%)” to something higher.</p>
	<p>20 CSR 4240-20.030(6)(A)3</p>	<p>Large load project’s anticipated service <b>location-address</b></p>	<p>As drafted, this paragraph requires the electric utility to maintain a database that identifies, in part, a large load project’s “anticipated service location.” However, this can be interpreted broadly. Because the amount of investment to site one of these projects can vary widely by location, the OPC suggests this change so that more granular data can be tracked.</p>