

AMEREN MISSOURI COMMENTS ON THE MAY 22, 2026, DRAFT IRP RULE

I. Introduction

Ameren Missouri appreciates the discussions held with Staff on June 5th and June 9th, on the topics of Chapter 020, Avoided Costs, and by Rate Class requirements in the draft rule.

This memo provides additional commentary on Ameren Missouri's key issues, as it relates to the May 22 draft and proceeds in two general sections. First, in Section II we provide specific commentary and feedback related to key issues.¹ Second, in Section III we attempt to provide information, to the extent practical given the complexity and detail in the latest draft rule, on the incremental cost of compliance relative to the explicit requirements of the statute. As noted throughout and in Section II, the complexity introduced by each of the key issues discussed in these Comments and certain other provisions/requirements would be expected to materially increase the incremental cost of compliance, often without a corresponding change in material decision making regarding the selection of a reasonable and prudent resource plan or in the meaningful review of the utility's decisions by stakeholders and the Commission.

In addition to this commentary, we provide:

- A completed Comment Table, using the format issued with the Commission's May 22, 2026, Notice; and
- An accompanying mark-up of the draft rule, which contains specific comments (only some of which we touch on in this document) for all, or nearly all of the edits reflected in the mark-up.

In our view, these three documents together provide the clarity, context, and rationale necessary to support the changes we have suggested be made to the draft IRP rules under consideration in this docket.

Before diving into specifics, we want to raise two general framing points.

First, we want to reiterate a point brought up during the April 16 workshop and within our May 7th comments: Ameren Missouri (and all utilities) have a powerful incentive to file the best IRP it can, with as much stakeholder input and consensus as reasonably possible in the pre-IRP Proceeding and as little contention and dispute as possible in the IRP filing docket itself. The reason is that an IRP that is hotly contested, that potentially faces myriad claims of incomplete information and analysis, insufficient

¹ While these are "key" issues there are many more important issues throughout the draft rule that Ameren Missouri has addressed in the documents accompanying this document.

justification, etc., creates an ever increasing chance that the Commission will not conclude that the proposed preferred resource plan (PRP) is a reasonable and prudent plan, and this would therefore reduce the utility's ability to gain access to the limited inquiry CCN process the statute allows but does not mandate.

At the same time, it is critically important to recognize that an Integrated Resource Plan, especially as it pertains to the post-implementation period, is very much a forecast, produced at a point in time and with the best information and analysis available. It is also not a rate case, with historical data that is not subject to significant disputes or differences of opinion. And it is certainly not a rate case reviewing the prudence of executing on projects, whether they receive CCNs under the limited process contemplated by SB 4 or via a "traditional" CCN process. We bring this up again to restate: it serves no one to adopt rules that are overly prescriptive, that call for highly granular detail covering each topical area explored in the IRP, data and analysis not related to (or only tangentially related to) resource planning, and that in general impose requirements that exact a tremendous effort, time, and expense without a concomitant demonstration that all this extra effort, all the detail, and indeed all of the information sought is going to lead to better resource planning or better regulation of utility resource decisions. And the rules must also be faithful to the General Assembly's words and intent: that the Commission can approve PRPs that reflect construction of specific projects *or quantities of technologies* within the implementation period and thereby allow those projects/quantities to proceed more expeditiously through the limited CCN process SB 4 provides.

Second, and related: throughout the draft rule, we have attempted to clarify the concepts of "Describe" and "Document," which are distinct terms and which, in many places (when one goes to apply the definitions as used in the substantive rule provisions) could not be expected to operate in a manner that made sense or that "works" in context (in some places, use of both terms in tandem does make sense, but in others it does not). We provide specific comments on each of the provisions in the draft rule where that "describe and document" phrase was used to explain our rationale for suggested changes.

We offer these comments in the spirit of continued constructive dialogue and exchange of language and hope this accomplishes the objective of producing a rule to propose in a formal rulemaking docket that (a) is faithful to both the letter and spirit of SB 4 (b) is workable for utilities and stakeholders alike, and (c) fairly adheres to resource planning and necessary information and analysis relating to projects/technologies expected to begin construction in the implementation period. Where possible, we also attempt to frame our comments in the context of these prior conversations, with our suggestions reflecting an attempt to craft language that addresses both the Staff's and the Company's articulated goals and concerns related to relevant issues.

II. Key Issues at this Stage and Commentary.

- a. *Clarity in Chapter 020, Consistent with 393.1900.1*
- b. *Chapter 065(1) Limited Inquiry CCN Process*
- c. *Avoided Costs*
- d. *Large load metrics*
- e. *By Rate Class Data/Analyses*

Clarity Regarding the Role and Nature of the Pre-IRP Process (020)

The role and nature of the pre-IRP process described in 020 must be clear so that all parties understand what the utility must or may bring into the process at the start, what kinds of input from parties are necessary and helpful to the Commission, and what the scope and effect of the Commission's pre-IRP order will be. In the course of conversations with Staff, it has not been completely clear (including in the May 22 draft) how this process is to work. In our view, the process should include the following:

1. Initial information in the form of minimum filing requirements to use as the basis for discussion and debate among stakeholders as to the types of information and analyses the Commission should consider when issuing its orders. This should include information from the utility's most recent IRP to satisfy most or all of the information needed to meet the minimum filing requirements, depending on whether and to what extent there are material known changes or events in the intervening time that necessitate a change to those prior IRP values/information. Such changes might include impactful changes in energy policy and regulations, major shifts in market conditions, or a significant change in the utility's outlook for large load customers, as a few examples. The intent should not be to require the utility to engage in an effort to re-do all assumptions, only those that represent changes that are so impactful that they necessarily would affect the nature of discussions among stakeholders during the pre-IRP process and the resultant Commission decisions reflected in its pre-IRP order. Initial information at this stage may often consist of general assumptions, e.g., on an annual or average basis, as opposed to a more specific and granular forecast at a more detailed unit of analysis.
2. Focused stakeholder discussions on key issues, information, and subjects for analysis. This goes hand-in-hand with the nature of the information described in item 1 above. Focusing on the kind of material changes described above since the utility's prior IRPs ensures that time will be spent by all parties on the most important information and issues and avoid duplication when the utility establishes its full set of assumptions for the development of its IRP filing (and the analyses reflected in it) based on the input of all stakeholders and the guidance and direction included in the Commission's pre-IRP order.

3. A Commission pre-IRP order that provides clear and concise direction for the utility in performing its IRP analysis and preparing its IRP filing. Burdening the Commission with myriad decisions on a host of intricately detailed assumptions and inputs would be a waste of the Commission's time and a waste of the time of all parties involved. The pre-IRP order should establish alternative resource plans or scenarios for the development of alternative resource plans, as required by statute, and relevant emerging factors which may involve consideration of policy, regulation, market operations, and other significant drivers of resource decisions.

In reviewing the current draft rules, the provisions, *as written*, tend to suggest requirements for a much more involved effort in preparing the minimum filing requirements for the pre-IRP process. For example, 020(3)(D)4A requires the utility to "Outline any differences between the information ordered by the commission..." and to include "the reason for those differences." This could be read to suggest that the Commission's order is expansive regarding the wide range of assumptions to be used by the utility and that those assumptions are to some degree "locked in" with isolated exceptions to be documented.

Consideration of the Limited Inquiry CCN Process (065(1))

Through the passage of SB4, the Missouri legislature strengthened the link between utility IRPs and CCN approval, and it streamlined the process for CCN approval for supply-side resources reflected in the IRP for which construction is to start within the 4-year implementation period specified in the statute. The current draft rule appears to attempt to take the pre-SB4 CCN process, as it has been conducted in recent years, and pack it into the IRP process in its entirety, ignoring the enhanced role of what will be an extremely rigorous IRP process to support conclusions of need and public interest and instead focusing on minute details that have been the focus of CCN cases in the *absence* of such a rigorous and meaningful IRP process. This is evident in new language in the current draft requiring the utility to 1) specify the projects for which it will or will not seek limited inquiry treatment in subsequent CCN applications pursuant to its approved preferred resource plan, and 2) provide greater detail for those projects for which the utility indicates it will seek limited inquiry treatment.

There are two problematic issues with this approach.

First, SB4 provides for Commission approval of resources in a preferred resource plan that are either specific projects *or quantities of a resource type* (e.g., 400 MW of simple cycle gas generation or 200 MW of solar generation). Requiring project-specific detail for any resources that are to be afforded limited inquiry treatment amounts to removing the ability to use the limited CCN process for quantities of a resource type, in direct contravention of SB 4. An administrative rule cannot in effect amend the statute in this fashion.

This is related to the second issue – the utility may not and likely will not know, at the time of its IRP filing, which projects for which it will or will not seek limited inquiry treatment. The implementation period for a utility's preferred resource plan is four years from the date the Commission issues an order on the utility's IRP filing, which is to occur approximately one year from the time the utility submits its IRP filing. Shorter lead-time resources like solar, battery storage, fuel cells, and perhaps others may yet require an RFP process and contract negotiations before construction, which could still be initiated during the implementation period.

To be clear, the Company has no issue with providing any details *it does have available* at the time of the IRP filing. In fact, the Company understands that the more such detail it can provide, the better a case it can make for Commission approval of its preferred resource plan. However, SB4 does not permit, much less require, the kind of distinction between specific projects and quantities of resource types that SB4 provides can be approved by the Commission and be eligible for limited inquiry treatment.

Avoided Costs (050)

We appreciate the opportunity to discuss avoided costs in greater detail with Staff on June 9th. As we understood the conversation, the primary intention of the current draft rule is to ensure that:

- Demand-side resources should be analyzed within the Capacity Expansion Model (CEM), alongside and in competition with supply side resources.
- Demand-side resources should be analyzed as multiple "tranches" of DSM, such that the CEM selects an appropriate combination of DSM from available candidate resource options.

Ameren Missouri agrees with these priorities.

To start, 060(4)(B) requires that utilities treat supply and demand side resources on a logically consistent and economically consistent basis. To do so, the rules must consider and allow for:

1. The appropriate screening of DSM measures for inclusion as candidate resources, consistent with the screening of supply-side resources described in 035(1) and (2). Cost effectiveness testing using explicit avoided cost components (i.e., energy, capacity, transmission, and distribution) remains the most appropriate way to conduct a preliminary screening.
2. The assessment and inclusion of broader market interactions in the calculation of avoided costs, consistent with 060. The utility should not be put back on an island – which is the approach the draft Rule takes -- by

requiring that demand-side resources be measured only against specific changes in units in a specific time period. Such an approach is overly narrow and contrary to broader best practice recommendations.

Our feedback herein and reflected in redlines represents our attempt to ensure the feasibility of implementing these steps and priorities in practice. This is particularly true given the breadth of available DSM for evaluation.

Simply put: it is not feasible to give a CEM all available DSM measures and ask the CEM to optimize across hundreds or thousands of endpoints. Instead, some type of screening analysis is required to give the CEM a logical and constrained selection of options, just as it is with supply-side options. This type of screening analysis is directly consistent with the same screening analysis taken with respect to supply side resources in 035(1) and 035(2). The LBNL best practices report affirms this approach and specifically notes the need to "bundle demand-side resources carefully" (Best Practice 20). This is necessary to ensure that "the modeling approach closely resembles actual program implementation practices" and to avoid "unnecessary computational complexity within a capacity expansion model." (LBNL 2024, pp. 42-43)

Cost-effectiveness testing, using avoided costs from the prior IRP, is the most feasible and logical way to complete this initial screening analysis. This process is used within the Company's current IRP process, and Ameren Missouri would expect to use a similar process to satisfy the requirements of the current draft rule. The Total Resource Cost test should remain the primary cost effectiveness test for screening analysis purposes. Consistent with our May15 comments, Ameren Missouri also continues to recommend that the rule rely on the Utility Cost Test and the Participant Cost Test to inform an understanding and analysis of non-participant and participant benefits, as opposed to more generic language on "impacts by rate class by participants and non-participants." Relying on these tests maintains consistency to broader DSM programs and implementation and industry best practice.

Ameren Missouri has provided redline comments that add back to the rule the language on cost effectiveness testing and more clearly indicate the order of operations with respect to screening analysis in 050(1)(A)1.

Ameren Missouri supports Staff's goal to create and leave flexibility in 050 for utility discretion when developing candidate resource options. Ameren Missouri would anticipate meeting the requirements of 050(1) by developing DSM candidate resource options for inclusion in the capacity expansion model as a set of reasonably screened DSM bundles at the sector level, organized by cost-effectiveness. This is largely consistent with the current approach used to develop residential, business, and low-income bundles at historical approval levels, a RAP level and MAP level. This would create nine DSM bundles for analysis within a CEM. The pre-IRP process can and

should be used for the utility to propose, stakeholders to request, and/or the Commission to order specific DSM candidate resource options or types of DSM candidate resource options for additional consideration as warranted. This would maintain logical consistency with the same treatment of supply side resources. The rule should avoid over specifying what DSM candidate resources should be considered.

Ameren Missouri would anticipate developing the forementioned DSM candidate resource options for analysis in the CEM in several sequential steps:

1. Avoided costs from the prior IRP would and should be used to help screen DSM measures as part of a DSM Potential Study. This ensures that bundles of DSM for analysis in the CEM are reasonably expected to be economic and allows for the combination of measures based on an expectation of net costs, among other criteria.
2. These bundles of DSM resources (historically, a RAP, MAP and existing portfolio) will be used in the IRP analysis and CEM alongside other supply side resources. The CEM and – equally importantly, the subsequent analyses within the broader evaluation scorecard and balancing factors – will be used to select the PRP. The DSM included in that PRP will by definition be cost effective relative to the other ARPs based on the present value revenue requirement, subject to the consideration of other balancing factors.
3. The utility will calculate the relevant avoided costs consistent with the PRP. These avoided costs will be used to inform future MEEIA and DSM filings and to inform future screening analyses for the subsequent IRP.

As noted in prior comments, the details of how to calculate avoided costs are difficult, nuanced, and carry a long history of litigation among various parties. Ameren Missouri appreciates Staff's intent and perspective to create flexibility in allocating avoided costs into individual components. But: it is not possible to develop avoided cost components (energy, demand, and T&D) from an individual comparison of select CEM model runs. We understood LBNL's comments during the 4/30 workshop to agree with this point.

CEM model runs do help inform the selection of the appropriate DSM level, subject to consideration of the other balancing factors, and do help ensure the selection of a PRP that minimizes the present value revenue requirement, again subject to consideration of other balancing factors.

Separate avoided capacity and energy costs *can* be generated from market scenarios, as Ameren Missouri does now and has done since MEEIA was enacted. These market scenarios result in detailed estimates of capacity and energy prices in the RTO market for the entire planning horizon, are based on market-level (i.e., the U.S. Eastern Interconnect) capacity expansion modeling and are the same market scenarios used for

valuing energy and capacity as part of the Company's integrated resource plan and risk analysis. Said another way: these market scenarios represent the same key inputs used in the CEM to select the PRP.

Developing avoided costs from these market scenarios – which are part of the CEM modeling of the PRP – is consistent with the MEEIA rule's requirement that "the utility shall use the integrated resource plan and risk analysis used in its most recently adopted preferred resource plan to calculate its avoided costs." (20 CSR 4240-20.092(1)(C)). Requiring that the avoided costs be based on the output of the CEM used for the PRP is a prime example of scope creep that extends beyond the MEEIA requirement and is at odds with industry best practices.

As noted in prior comments and in the workshops, the calculation of avoided costs should not be solely tied to specific resources within the PRP, nor to the PRP or any specific alternative resource plan alone. The marginal cost of energy and demand is inextricably tied to market purchases of the same. And these market purchases reflect the broader costs of the resource mix expected to be in operation at the relevant time. Said another way: including market purchases allows avoided costs to appropriately change as the underlying mix of solar, wind, gas, and other resources in the broader market change as well.

Together, these changes ensure that demand-side and supply-side resources can be treated in a "logically consistent" manner as contemplated by 21.060(3)(C), which ensures that supply-side resources and ARPs include consideration and analysis of market purchases and market interactions. To reiterate a previous point, the utility should not be put back on an island – which is the approach the draft Rule takes -- by requiring that demand-side resources be measured only against specific changes in units in a specific time period. Such an approach is overly narrow and contrary to best practices.

Large Load Metrics

Ameren Missouri has also proposed some edits to the large load metrics within the definitions and again in 030. We appreciate Staff's willingness to respond to earlier feedback, related to better defining stages of interest and intent. We offer comments in these sections to further help clarify and align intent, to ensure that the information provided best meets the needs of stakeholders as we understand them from current conversations.

Within the definition of large load metrics, we suggest defining permanent service as the metric of commercial operation. This creates an objective point in time for when the large load will be included in the load forecast.

Secondly, within the definition of metrics, it is important to re-order the metrics in sequential order and further clarify which metrics are supposed to capture ex ante forecast values and which metrics are supposed to capture ex post historical or realized values for

the purposes of tracking within a database. The definition as written is mis-aligned and unclear on this.

Specifically, Ameren Missouri reads the intent of the large load metrics definition to request the following ex ante forecast values:

- Commercial Operation (defined as permanent service) for all potential large load projects included in the forecast, expressed as a date;
- The load ramp for each of those projects, ramping from commercial operation to peak load; expressed as capacity in MW, and the forecasted peak load is equal to the contracted or requested peak load; and
- The load shape used as part of the load forecast alongside the load ramp; expressed as a representative monthly and hourly ratio of peak load.

And the following ex post realized values:

- Load realization, measured as the actual maximum operation as a percentage of the requested or contracted peak load.

Given the importance of large load metrics to all stakeholders, Ameren Missouri suggests that an illustrative or hypothetical data table as currently contemplated in 030(6)(A)4 would benefit all stakeholders.

Similarly, within 030(6)(B), Ameren Missouri has proposed additional edits to further clarify key phases of large load projects. This more clearly articulates a study phase (by both or either the Utility and RTO), a construction agreement phase, and an execution phase. This is a necessary clarification as some projects may execute a construction phase but then elect not to move to a full execution phase.

By Rate Class

The draft rule includes multiple references and requirements to produce analyses at the rate class level. Under the current IRP rule, load analysis and forecasting is conducted at the rate class level, and as discussed further below, a continuation of that practice is both reasonable and appropriate. That is reflected in the draft rule at 030-(3)(C)3B, and Ameren Missouri supports the inclusion of *that* requirement of rate class level analysis.

However, additional references to rate class level analysis go far beyond the proper scope of resource planning. Thus, such requirements have no place in an IRP rule and represent a requirement that would result in substantial expansion of the already extremely complex financial modeling in the IRP that has no bearing on the important resource decisions considered in the IRP itself. (The IRP is not, nor should it, become a "repository" for information a stakeholder *might* find "useful" or "interesting" in other contexts, or that *might* be relevant in different Commission proceedings).

As the Company has articulated at the workshops and meetings with Staff, these additional references to rate class level detail would not result in information that would contribute to improved resource planning decisions. Proposed requirements for rate class level analysis found at 030-(3)(C)3C(III), 030-(7)(B)2, and 060-(1)(C)1C would add burdensome analyses to the IRP process to calculate future rates or rate impacts – financial outcomes – at the rate class level that would create substantial work –requiring additional internal employees or consultants as noted in the cost of compliance section of the rule.

As noted, rate and/or other cost or financial analyses at the rate class level would not contribute to improved resource planning decisions, but analysis of the total costs of the system does. The system must be designed to meet the total retail load needs of *all* of the Company's customers. Minimization of total costs (on a net present value revenue requirement basis) has been the primary selection criterion for IRPs in the existing rule for decades and continues to be the primary metric for resource planning across the industry, and for good reason. Minimizing total costs benefits all stakeholders and results in the lowest total cost of service for all customers.

Rate class specific analysis would be virtually guaranteed to demonstrate that the same resource plans that are lowest cost in total are also lowest cost for each and every rate class, but even if some outlier case arose, the solution would be to change the allocation in a future rate case or rate cases, *not* to implement a more expensive resource plan. Put another way, to the extent that some peculiarities of a particular resource plan and its interaction with allocation factors resulted in the rate class level analysis demonstrating that rates for one class would be higher under the plan selected than they were under another alternative resource plan with the lowest total cost – that would not logically result in selection of that alternative plan that – by definition would necessarily increase total costs to all customers.

The plan that was lower cost for some class or classes but that was higher cost in total would necessarily increase costs for other classes. It would be logically and economically inefficient to increase total costs to Missourians in order to try to pick winners and losers by rate class. Moreover, the Commission retains broad authority in the context of general rate cases to either select new allocation factors that mitigate any undue impact on a specific class, or to approve rates that deviate from class cost of service results for policy reasons. It is simply unnecessary and inappropriate to inject rate class level outcomes into decisions regarding the selection of resources needed to meet total system needs.

While it might be interesting for the Commission or stakeholders to understand rate class level outcomes of various plans, the addition of such information is not an improvement that justifies its costs. There is a role for each type of proceeding in front of the Commission. Rate allocations are the province of *rate cases* and should be assessed in

that environment. IRPs simply have a different purpose – efficiently planning the least cost system (subject to balancing of other planning objectives and risk assessments) for the benefit of all. Rate class analysis should be deleted in all instances in the draft rule other than the load forecasting requirement.

III. Incremental Cost of Compliance

Given the expansive and detailed draft rule, it is difficult to estimate with precision what compliance with the May 22 draft rule's provisions that are incremental to the basic requirements of SB 4 will cost. Having said that, Ameren Missouri has attempted to develop a range of estimated costs. These include costs for software, system upgrades and changes, added FTE (wages, benefits), and additional consultant costs relating to data, analysis, and information requirements. In total, the Company estimates a total ongoing annual cost of \$2-5 million. The Company would also expect to incur additional costs of \$1-2 million per IRP cycle (i.e., every four years) for consulting and legal services as well as one-time costs of \$1-3 million for software installation, testing, training, and any necessary hardware.

In general, the following non-exhaustive list of topics/requirements in the rule drive these costs estimates:²

- Mandated use of CEM.³
- Requirement that utilities (shareholders) fund CEM.
- Mandates on access to modeling and lack of clarity on how costs of onboarding stakeholders, facilitation data interfacing, etc. will be handled.
- Contemplation of scenarios and sensitivities in pre-IRP, not just a minimum set of alternative resource plans.
- Requirement for utility-specific pre-IRP not one generic proceeding every four years, with public and stakeholder processes run by the utility and utility specific rather than Commission-run generic process.
- By Rate class modeling requirements.
- Extensive and detailed Data/Data set standard.
- Non-MEEIA DSM analysis requirements.
- In the DSM chapter, requirement for rate impacts to each class, and for participants and non-participants.
- Load forecast requirements for every substation.

² Ameren Missouri does not oppose all of these items – see the above-Comments and accompanying rule mark-up and comments – but they will drive incremental costs.

³ The statute requires the utility to outline how it uses it but does not mandate its use. The Company is not objecting to proper use of CEM.

- "Describe and document" requirements (under definition as proposed and how it is used – approximately 62 times in the rule).
- Transmission and distribution stress test requirements (and related describe and documentation requirements).
- Reinvention of data and analysis regarding transmission planning that is already part of the RTO transmission expansion plan.
- For distribution planning, extensive describe and document requirements on many details about condition, etc. of entire distribution system, plus applied to three load scenarios.
- DER Database requirements.
- DER cost/benefit analyses requirements.
- Requirements for hypothetical rate case timing related analyses.
- Requirements for analyses isolating implementation period.
- Duplicative performance measure information requirements.
- Duplicative price elasticity analysis already part of load forecasting.
- Tremendous details required regarding end point information.
- Incremental legal costs associated with the greater likelihood of contention in pre-IRP and IRP filing dockets given the expansive nature of the issues/information/analysis reflected in the draft rule.

Stakeholder	Rule Citation	Requested Change	Summary of Comment
Ameren Missouri	.010(2)(A)	Strike "(IRP) filings"	Due to clarification of definitions in .015
Ameren Missouri	.010(2)(C)	Insert "the preferred resource plan" and strike "it" so that it reads "...determine if the preferred resource plan appropriately addresses...."	The statute is explicit: the Commission must determine if the PRP balances those factors. The IRP is the entire filing; the entire filing can't possibly balance all those factors but the PRP can (and it must) per the statute.
Ameren Missouri	.015(2)	Insert "or, with respect to the commission's order to be issued in 20 CSR 420-21.020(2)(B)12, a set of conditions used to describe such a schedule (e.g., retirement of an existing resource by a certain date, inclusion or exclusions of certain supply-side, or demand-side resources)." so that it reads "... obligations or, with respect to the commission's order..."	Given the Commission latitude in prescribing the ARPs from the pre-IRP proceeding while drawing a necessary distinction between what an ARP is when used in .060 versus what is happening in the pre-IRP proceeding.
Ameren Missouri	.015(6)	Strike "(IRP) filing".	Due to clarification of definitions in .015
Ameren Missouri	.015(7)	Insert "or the corresponding market-based equivalents of those costs" so that it reads "...distribution or the corresponding..."	Added for consistency with avoided energy cost definition

Ameren Missouri	.015(13)	Insert "via supply-side resources or the avoidance of the need for this capability by demand-side resources " so that it reads "...power via supply-side resources..."	Necessary to represent both the load and the supply - defn is not exclusively a supply attribute, it's also a demand attribute; hence use in .030 and .060
Ameren Missouri	0.015(22)	<p>Strike "and document" and strike "the demonstration of compliance with each provision of this chapter" so that it reads "Describe means: the provision of information..."</p> <p>Insert "reasonably" so that it reads "...detail to reasonably inform the stakeholders..."</p> <p>Insert "reasonably allows" and strike "would allow" so that it reads "...in a manner that reasonably allows a stakeholder to..."</p> <p>Insert "applicable" so that it reads "...electric utility's applicable analysis..."</p>	<p>"Describe and document" aren't a demonstration of compliance and they do not always both apply - see specific edits throughout the rule below.</p> <p>An absolute requirement creates a trap for a dissatisfied stakeholder to claim non-compliance - Commission can resolve disputes about what is reasonable</p>
Ameren Missouri	0.015(23)	Strike "the" and insert "an" so that it reads "...information relating to an analysis."	There are many analysis in an IRP
Ameren Missouri	0.015(30)	Strike "End point means a designated juncture within an electric utility planning model or scenario framework that is the result of applying specific potential outcomes associated with each critical uncertain factor."	Not used

Ameren Missouri	0.015(47)	Strike "submitted as the IRP filing" and insert ".2, .3" so that it reads "...means the document in accordance with section 393.1900.2, .3, which addresses the requirements..."	No need for two definitions describing the same filing; for clarity, reference .2 and .3, which are the statutory sections governing the <i>filing</i> requirements the utility must meet
Ameren Missouri	0.015(48)	Strike "Integrated resource plan (IRP) filing means the IRP submitted to the commission in accordance with section 393.1900, RSMo."	See above comment
Ameren Missouri	0.015(49)(A)	Insert "schedule of dates upon" and strike "rate at" so it reads "Project realization means the schedule of dates which large load..."	Edits to LL Metrics definition are to track apparent intention – when the projects are realized and how we know that; when loads are realized and when that happens; clarity on when the ramp is; accurate description of load factor and load shape; ; load realization should go after load because it is ex post after the ramp
Ameren Missouri	0.015(49)(B)	Insert "Permanent service date" and strike "Energization date"; Insert "dates" and strike "schedule for" so that it reads "Permanent service date means the date when large load..."	See above comment
Ameren Missouri	0.015(49)(C)	Insert "the permanent service date" and strike "energization" so that it reads "...fully ramp from the permanent service date to maximum..."	See above comment

Ameren Missouri	0.015(49)(D)	Insert "the date permanent service is supplied to the" and strike "initial"; strike "energization" so that it reads "...during the period between the date permanent service is supplied to the project and reaching full forecast peak load."	See above comment
Ameren Missouri	0.015(49)(E)	Insert "potential energy used based on continuous energy demand at the customer's" and strike "of" so it reads "...use as a proportion potential energy used based on continuous energy demand at the customer's peak demand."	See above comment
Ameren Missouri	0.015(50)	Strike "cost recovery mechanisms"	Has nothing to do with resource planning
Ameren Missouri	0.015(59)	Strike "Materially changed means a change in cost, scope, or conditions that is significant enough to reasonably influence the decision or judgment of the commission or alter the commission's evaluation of the plan's prudence or cost effectiveness."	Clarifying when it comes into play - and REF may not support IRP decisions but by specifying them PSC is saying we want them addressed
Ameren Missouri	0.015(68)	Insert "Participant costs test means a test of the cost-effectiveness of demand-side programs that measures the economics of a demand-side program from the perspective of the customers participating in the program."	See latter comment about PCT, TRC, UCT and DSM
Ameren Missouri	0.015(72)	Insert "and" and strike "any other factors" so it reads "...alternative resource plans, scenarios, sensitivities, and relevant emerging factors."	See comments above and below about definition of relevant emerging factors

Ameren Missouri	0.015(78)	Insert "in the pre-IRP proceeding" and "and that should therefore be addressed in the electric utility's IRP" and strike "to support decisions in an electric utility IRP filing" so it reads "...where the commission in the pre-IRP proceeding has determined that additional research and knowledge is needed and that should therefore be addressed in the electric utility's IRP"	
Ameren Missouri	0.015(79)	Strike "9" and insert "8" so it reads "68"	Why not delete this definition and change where it is used to "planning horizon"?
Ameren Missouri	0.015(85)	Strike "model run with a specific" so it reads "Scenario means a set of input assumptions and constraints."	This definition is used in the pre-IRP proceeding language and in the load forecasting chapter - as used it is not a model run - this definition works in both places
Ameren Missouri	0.015(95)	Insert "Total resource cost test means a test of the cost-effectiveness of demand-side programs that compares the sum of avoided utility costs plus avoided probable environmental costs to the sum of all incremental costs related to the end-use measures that are implemented due to the program or related to the rates (including both electric utility and participant contributions), plus utility costs to administer, deliver, and evaluate each demand-side program to quantify the net savings obtained	See later comments in DSM chapter - need to define TRC, PCT, and UCT

		by substituting the demand-side program for supply-side resources."	
Ameren Missouri	0.015(99)	Insert "Utility cost test means a test of the cost effectiveness of demand-side programs that compares the avoided utility costs to the sum of all electric utility incentive payments, plus utility costs to administer, deliver, and evaluate each demand-side program to quantify the net savings obtained by substituting the demand-side program for supply-side resources."	See earlier comment and comment in DSM chapter
Ameren Missouri	21.020(1)	Insert "file", strike "make", insert "as required by section 393.1900.2, .3", and strike "filing" so it reads "Each electric utility shall file an integrated resource plan (IRP) as required by section 393.1900.2, .3 every four (4) years, or as otherwise..."	Having two definitions (one of "IRP" and one of "IRP filing" is confusing when applied throughout the rule. 393.1900.1 is the Pre-IRP filing, as it has now been defined. 393.1900.2, .3 require the filing of a quadrennial IRP, i.e., the "IRP". 393.1900.4, .5 prescribe the Commission's role in evaluating and ruling on the IRP. If one simply makes this clear there is no need for two definitions, one of which depends on the other.

Ameren Missouri	21.020(2)(A)	Insert "A" and strike "The" so it reads "A pre-IRP proceeding, as outlined in section 393.1900.1., RSMo, shall be conducted to:"	There will be more than one
Ameren Missouri	21.020(2)(A)(1)	Insert ", pursuant to section 393.1900.1(4), a commission-prescribed set of", insert "as well as any commissions-prescribed", insert "and", strike "relevant emerging factors, and other operating factors, strike "take" and insert "analyze in its IRP filing," so it reads " Establish, pursuant to section 393.1900.1(4), a commission-prescribed set of alternative resource plans, as well as any commission-prescribed scenarios, and sensitivities, that an electric utility shall analyze in it's IRP filing,"	Very important reference - makes clear what the Commission is tasked with in the statute 393.1900.1(4) specifies the commission's establishment of a prescribed set of ARPs See comment on definition of "relevant emerging factors" - "other operating factors" is not defined anywhere and can fit within the "relevant emerging factors" definition
Ameren Missouri	21.020(2)(A)(2)	Insert " Specify factors that the electric utility may take into account in analyzing the alternative resource plans the commission established under section (2)(A)1; and"	Same subsection of the statute says commission will specify the factors

Ameren Missouri	21.020(2)(A)(3)	Insert "Specify relevant emerging factors that an electric utility shall examine in its IRP filing, strike "into account in its IRP filing made pursuant to section (1),"	Statute doesn't provide for this but it is an appropriate place to provide the commission flexibility to have other areas examined
Ameren Missouri	21.020(2)(A)(3)	Insert " The alternative resource plans established under this section (2) shall be analyzed in addition to those determined through capacity expansion modeling as required by 20 CSR 4240-21.060 or otherwise established by the electric utility for analysis in its IRP filing. "	To be clear what is happening in the pre-IRP versus in the IRP itself
Ameren Missouri	21.020(2)(12)	Insert "and specifying", insert "items addressed in section (2)(A), and strike "information outlined in section 393.1900.1, RSMo." so it reads "...the commission shall issue an order to establishing and specifying the items addressed in section (2)(A)	To confirm to earlier changes
Ameren Missouri	21.020(2)(C)	Insert " The minimum filing requirements may consist of values and information for the items specified above from the electric utility's most recent IRP filing (and, in the case of the electric utility's first IRP proceeding, its most recent triennial IRP and change in preferred resource plan filing), provided, that to the extent the electric utility, as part of its ongoing resource planning efforts or because of a material condition or event that necessitates a change, has updated such values or information, as applicable, as of the time of its filing of the minimum filing requirements,	For the timeline to work and to avoid what would be a serious problem of using stale/inapplicable data when the actual IRP filing analyses are done, the utilities need to be able to lean on the prior IRP for the inputs for pre-IRP proceeding MFRS. We also included the "or because of a material condition or event that necessitates a change" language to acknowledge

		such updated values or information, as applicable, shall be used."	that some conditions or events would simply require the utility to update values (e.g., a new ESA with a large load customer or loss of a major unit).
Ameren Missouri	21.020(3)(D)	Strike "and document", "electric utility's", and "analysis", and insert ", and document the analysis, the electric utility utilized" and "(in addition to those established in the pre-IRP proceeding)" so that it reads "Describe the assumptions, inputs, and decisions, and document the analysis, the electric utility utilized in developing the alternative resource plans (in addition to those established in the pre-IRP proceeding),..."	To properly utilize the definitions of "document" and "describe"
Ameren Missouri	21.020(3)(D)(3)	Insert "a discussion of" and strike "additional stand alone chapters that:" so it reads "Incluuse a discussion of"	These items don't necessarily rise to the level of deserving an entire chapter
Ameren Missouri	21.020(3)(D)(3)(A)	Strike "outline" and "paragraph", "F", and "5" and insert "Any", "section", "B", and "12" so it reads "Outline any difference between the information ordered by the commission in section (2)(B)12 and the information..."	Mistaken reference (and below)
Ameren Missouri	21.020(3)(D)(3)(C)	Strike "paragraph", "F", and "5" and insert "B" and "12" so it reads "Address relevant emerging factors ordered by the commission under section (2)(B)12.	See above

Ameren Missouri	21.025(1)	Strike "(IRP) filing" so that it reads "...integrated resource plan that establishes and demonstrates..."	
Ameren Missouri	21.025(2)	Insert "The content of any analysis submitted in the IRP filing docket by any other party thereto or on its behalf must enable the commission to evaluate the soundness, reliability, and transparency of the data, assumptions, methods, and analytical tools used in such analysis and underlying any other plans advocated for by such a party. "	Requirement should apply to all
Ameren Missouri	21.025(3)(A)	Insert "generally", "and provide documentation underlying them", and "Any other party to the IRP filing docket shall also generally describe all datasets used in any analysis submitted the party or on its behalf and provide documentation underlying them to the extent reasonably necessary to understand its analysis and conclusions" and strike "and document" so that it reads "...shall generally describe all datasets used in each IRP filing and provide documentation underlying them to the extent..."	Defined term doesn't make sense in this context - definition says describe how you complied and provide documentation underlying the analysis. We understand you want a description of the datasets and you want documentation behind them, but your definition isn't asking for that. Requirement should apply to all
Ameren Missouri	21.025(3)(B)	Insert "to the extent reasonably possible" so that it reads "...generation planning to the extent reasonably possible/"	Absolute, perfect alignment no possible

Ameren Missouri	21.025(4)(A)	Insert "and all parties to the IRP filing docket" so it reads "The electric utility and all parties to the IRP filing docket shall provide..."	Requirement should apply to all.
Ameren Missouri	21.025(4)(A)(2)	Strike "to allow full traceability of calculations and insert "and" so it reads "...data links intact, and..."	Impossible - neither the production cost model nor the financial model allow this - the rest of this Item 2 gives you all that can be or needs to be provided
Ameren Missouri	21.025(4)(A)(3)	Strike "Functional; and"	This adds nothing and is confusing - 2 covers it already.
Ameren Missouri	21.025(4)(B)	Strike "Contained in file sizes..."	Unreasonable and beyond the utility's control - The Commission, OPC, parties themselves need to stand up their own architecture in a manner that allows them to receive files of the size that the utility's models produce - the nature of the modeling is that the file sizes will be quite large in many cases and that can't be changed (can't do a reduced-size pdf if we are going to provide a file with formulas intact and data links intact)

Ameren Missouri	21.025(4)(B)	<p>Strike "describe and document" and insert "provide a reasonably detailed narrative description of the steps reflected in" so that it reads "...shall provide a reasonably detailed narrative description of the steps reflected in the process..." and insert "Any party to the IRP filing docket that submits or has submitted on its behalf alternative plan recommendations shall provide the same diagram and description as required of the electric utility to support its alternative recommendations. "</p>	<p>How does one “describe” a process flow diagram - the diagram is observable, e.g., Staff did not “describe” its various diagrams; instead, it provided them and labelled them How does one “document” a diagram - the diagram is the documentation. And again, the definition of “describe and document” doesn’t fit here - the process flow diagram isn’t an analysis.</p> <p>Requirement should apply to all.</p>
Ameren Missouri	21.025(4)(C)	<p>Strike "interaction of linked" and "including the sources of information utilized for each process and file location in which the underlying information is provided" so that it reads "The electric utility shall provide a summary workbook that indicates the workpapers provided in support of the IRP filing."</p> <p>Insert " All other parties to the IRP filing docket shall submit workpapers in support of their responses to or proposed alternatives to the plans reflected in the electric utility's IRP filing. "</p>	<p>The need is already addressed in the specification of what must be in the workpapers - intact links, formulas, etc. - so unnecessary relative to value (if any) it would provide.</p> <p>Requirement should apply to all.</p>

Ameren Missouri	21.025(4)(D)	Insert "and all parties to the IRP filing docket" so that it reads "The electric utility and all parties to the IRP filing docket shall provide..."	Requirement should apply to all.
Ameren Missouri	21.025(4)(E)(2)	Insert "The same requirements shall apply to materials used to support filings of other parties to the IRP filing docket in response to the electric utility's IRP filing."	Requirement should apply to all.
Ameren Missouri	21.025(5)(C)	Insert "All other parties to the IRP filing docket shall also label each plot and provide the data contained in or underlying that party's responses to the electric utility's IRP filing in the same manner required of the electric utility in sub-subsections (A) and (B)."	Requirement should apply to all.
Ameren Missouri	21.025(5)(D)	Strike "and the workpapers"	Already described in the technical volumes; the workpapers have prescribed requirements above; what is the purpose of requiring all this effort for intermediate type tables and aren't used in the filing itself?
Ameren Missouri	21.025(6)(A)	Insert " together with reasonable documentation of the same, and shall also and provide a reasonably detailed narrative outlining the"	Same comment as above - documentation requirement should be reasonable - Commission can resolve

			disputes if someone doesn't think it's reasonable. We did not strike "inclusion or exclusion", inclusion or exclusion of what? – pending gaining an understanding of intent.
Ameren Missouri	21.025(7)	Insert " and any other party to the IRP docket shall include an indication of whether relevant costs and benefits in their respective filings are expressed in real or nominal dollars" and strike "express all costs and benefits in nominal dollars."	Requirement should apply to all "costs" is broad - there are a lot of instances where use of real dollars is appropriate
Ameren Missouri	21.025(9)	Insert "Subject to their ability to securely receive and house the same," and strike "formatting and data files" and "The electric utility shall bear all costs of compliance for this section" so that it reads "Subject to their ability to securely receive and house the same, the electric utility shall provide staff and public counsel reasonable access to modeling software, tools, & standards, the electric utility used for the purpose of verifying results or performing independent modeling runs as the commission designated in conformance with section 393.1900.1(5) RSMo".	Nothing in the statute dictates that utilities must fund licenses, IT infrastructure, etc. necessary for Staff or OPC to have this access. Note that .025 as we understand it is already broadly defined to ensure formatting and data files are accessible
Ameren Missouri	21.030(1)(C)	Insert "weather-sensitive" so it reads "...normalize all weather-sensitive historical load data..."	If the load isn't weather sensitive then there is nothing to normalize; rule

			should not assume that all loads are weather sensitive, which is arguably implied by the language
Ameren Missouri	21.030(1)(E)	Strike "The electric utility shall describe and document the descriptive statistics for each end use".	We don't have this - in most cases we have values taken from reports but not descriptive statistics as defined
Ameren Missouri	21.030(1)(F)	Strike "and" and insert "or" so that it reads "...income, economic growth, or other economic..."	Not all of these may materially influence load at a given time
Ameren Missouri	21.030(1)(J)	Strike "electrified heating, such as heat pumps," so that it reads "...adoption of electric vehicles, and other electrification technologies..."	We use an energy intensity measures - don't have data specific to electrified heating
Ameren Missouri	21.030(1)(K)	Strike "accounts for" and insert "considers" so it reads "...forecast considers the effects of..."	See comment in (4)(D)4 below
Ameren Missouri	21.030(2)(D)1	Strike "and document" and "data inputs" and insert "and" and "provide the data inputs and documentation of their source" so it reads "Describe the model structure and functional form and provide the data inputs and documentation of their source."	This is apparently what is intended - define doesn't make sense when applied to entire sentence
Ameren Missouri	21.030(2)(D)3	Strike "demonstrate that" and "and document" and insert "explain how" and "and any documentation relied upon to determine them." so it reads "The	Demonstrate implies a level of quantification or proof that may not be possible and

		electric utility shall explain how the resulting forecast achieves a level of rigor, transparency, and detail that is comparable to an econometric load forecast; and shall describe the advantages, tradeoffs, and limitations of the selected methodology and any documentation relied upon to determine them."	while the definition to some extent could work the definition refers to "an analysis" - a methodology is not an "analysis" so inapplicable here.
Ameren Missouri	21.030(2)(F)	Strike "and document" and insert "describe" so it reads "...shall describe the equations..."	Again, these themselves are not analysis - they are components of or methods used to perform an analysis
Ameren Missouri	21.030(2)(H)	Strike "and document" so it reads "...shall describe the estimation techniques..."	Again, these themselves are not analysis - they are components of or methods used to perform an analysis
Ameren Missouri	21.030(2)(H)2	Strike "the" and insert "any" so it reads "Description of any calibration..."	There may not be any such models
Ameren Missouri	21.030(2)(I)	Strike "and document" so it reads "...shall describe how the model incorporates..."	The models, variables, and sensitivities are not an analysis - how does one document how something does something?
Ameren Missouri	21.030(2)(K)2	Strike "shall identify an identification of sources of error or bias, and shall explain an explanation of how the electric utility used these findings to	Really burdensome and/or infeasible in complex models used for forecasting

		improve the current forecast" so it reads "...past forecasts and an evaluation of forecast accuracy; and".	to do a port-mortem on all of the assumptions and determine which ones led to variances/biases.
Ameren Missouri	21.030(2)(K)3	Strike "describe and document" and "create" and insert "provide" so it reads "The electric utility shall provide a forecast of net system..."	A forecast is not an analysis - it is the result of analysis that the utility provides.
Ameren Missouri	21.030(4)(C)	Insert "the electric utility shall" so it reads "The electric utility shall develop the base-case load..."	Clarifications for consistency of how this list is presented
Ameren Missouri	21.030(4)(D)1	Insert "Describe and document" so it reads "Describe and document forecasts of the hourly load profile..."	Follows from prior edit - using applicable verbs
Ameren Missouri	21.030(4)(D)2	Strike "based on a minimum of twenty (20) years of historical data" and insert "Describe and document" so it reads "Describe and document forecasts of monthly and annual energy consumption..."	Forecast analyst should have discretion to pick the amount of data to use in the model. There may be very good analytical reasons not to use 20 years.
Ameren Missouri	21.030(4)(D)3	Strike "based on a minimum of twenty (20) years of historical data" and insert "Describe and document" so it reads "Describe and document forecasts of monthly peak demand for each customer class..."	Forecast analyst should have discretion to pick the amount of data to use in the model. There may be very good analytical reasons not to use 20 years.

Ameren Missouri	21.030(4)(D)4	Insert "Explain" so it reads "Explain how the forecast..."	The list in (D) are things the utility is supposed to do so using appropriate verb
Ameren Missouri	21.030(4)(D)5	Insert "Explain" so it reads "Explain how the forecast..."; strike "including" and insert "which may include, but are not limited to" or delete "real price of competitive energy sources"	The list in (D) are things the utility is supposed to do so using appropriate verb' also, the real price of competitive energy sources simply should not be expected to have a statistically significant relationship and needs to be excluded from the list or else the list should be a may versus shall list.
Ameren Missouri	21.030(4)(D)6	Insert "Provide" so it reads "Provide estimates of the monthly cooling..."	The list in (D) are things the utility is supposed to do so using appropriate verb
Ameren Missouri	21.030(4)(D)8	Insert "Provide" so it reads "Provide graphical plots..."	The list in (D) are things the utility is supposed to do so using appropriate verb
Ameren Missouri	21.030(4)(D)9	Strike "Describe the models and methods used to develop independent variable forecasts, including the rationale for model selection, the functional form of the models, and any judgmental adjustments applied."	Independent variable forecasts often come from third party consultants or entities like EIA, or are simple calculations like normal weather. I'm not sure of any independent variable where the utility forecasted it, or even has direct access

			to the models or methods used to forecast it.
Ameren Missouri	21.030(4)(D)9	Insert "Explain" so it reads "Explain how the forecast is consistent..."	The list in (D) are things the utility is supposed to do so using appropriate verb
Ameren Missouri	21.030(4)(D)10	Insert "Explain" so it reads "Explain how the base-case load..."	The list in (D) are things the utility is supposed to do so using appropriate verb
Ameren Missouri	21.030(5)(B)1	Add "and RTO" after "Utility" and add at end "; and/or have been submitted to the RTO for additional study"	For clarity to align with the actual process
Ameren Missouri	21.030(5)(B)2	Edit so item reads: "Construction Agreement Phase. Large load projects in this phase have executed relevant construction agreements and made any required payments, but have not yet executed an electric service agreement;"	To reflect next sequence in process; study results come back and then once scope generally known move to construction agreement phase
Ameren Missouri	21.030(5)(B)3	Add "completed steps 1 and 2 and" between "have" and "executed" and strike "interconnection agreement..." to end	To reflect next sequence; stricken items already covered in 1 and 2
Ameren Missouri	21.030(5)(B)4	Strike "energization" and substitute "permanent service date"	More accurate descriptor of start of ramp period under ESAs
Ameren Missouri	21.030(6)(B)	Strike "and document" so it reads "...shall describe how large load forecasts..."	It is not possible to document something that didn't happen, e.g., if a plane doesn't fly from point A to point B, we can't document the flight that did not exist

Ameren Missouri	21.030(6)(D)2	Strike "and document" and "non speculative" so it reads "Describe the methodology, data sources, and assumptions..."	Not an analysis to document; By the nature of forecasting, judgment has to be used and non-speculative suggests that it cannot be used, which is incorrect - it has to be.
Ameren Missouri	21.030(6)(D)3A - C	Check references	References appear incorrect
Ameren Missouri	21.030(6)5	Strike "and document" so it reads "Describe how large loads..."	Not an analysis
Ameren Missouri	21.030(6)6	Strike "and document" and "and identify the statistical methods employed to normalize historical loads," and "humidity, and" so that it reads "Describe how the forecast incorporates..."	Not an analysis - it's a description, an explanation
Ameren Missouri	21.030(7)(B)2	Strike "for each rate class based upon the most recently proposed class cost of service allocation"	This is the resource planning rule and no one would or should make a different resource decision based on hypothetical class impacts that will be based on Commission determinations in every rate case. Including this implies it has something to do with resource planning - and it doesn't - and an

			allocation from a prior case is meaningless as to how allocations may happen over the coming 16 years
Ameren Missouri	21.030(8)(A)1	Insert "which may include" so it reads "...variables, which may include, but are not limited to..."	Not all of these would necessarily be key variables in all cases
Ameren Missouri	21.030(8)(B)	Strike " For each scenario, the electric utility shall provide a load forecast for each of the distribution substations affected by the overall load growth. The electric utility shall describe and document the methodology used to forecast the distribution substation load, and should include a discussion of historical load growth within the geographical area served by each distribution substation, as well as any known changes, such as customer additions, in the geographic area served by each distribution substation."	A methodology is not an analysis; and, this would involved hundreds of substations – completely burdensome for no benefit.
Ameren Missouri	21.035(1)(A)2	Strike "meaning" and insert "(e.g., a technology for which" and "is currently in operation or advanced stages of development" so it reads "...planning horizon (e.g., a technology for which an operational pilot of 10 MW or greater is currently in operation or advanced stages of development);"	Should avoid absolute qualifications while indicating what could constitute such a technology.

Ameren Missouri	21.035(2)(B)1	Insert "that may be subject to changes in configuration or operation during the planning horizon, including changes in environmental controls or retirement dates"	It should not be necessary to detail every unit for which no changes are to be evaluated since it would not have an effect on the relative performance of alternative resource plans.
Ameren Missouri	21.035(2)(B)2	Strike "probable"	This appears to be an artifact of the "probable environmental cost" language previously in this provision. If not, it's use here is not clear.
Ameren Missouri	21.035(2)(C)2	Strike "Costs of ancillary and/or back up supply side resources required to achieve necessary reliability levels or assumed capacity accreditation level"	Reliability level cannot be estimated by looking at one or two resources together. It must be done at a portfolio level as part of the alternative resource plan analysis. Capacity accreditations are produced for each resource type individually and do not assume additional/back-up supply.
Ameren Missouri	21.035(2)(C)3	Strike "identify"	Leftover word.

Ameren Missouri	21.035(2)(E)	Strike "the" and insert "its analysis reflects a" and "that" so it reads "...The electric utility shall ensure that its analysis reflects a transmission network that is capable..."	The focus should be on the adequacy of the transmission network representation included in the analysis.
Ameren Missouri	21.035(3)(F)	Strike "develop, describe and document ranges of values and probabilities for the factors related to" and "considered" and insert "consider" so it reads "The electric utility shall consider the impact of implementing alternative fuel options for supply..."	This should be considered as part of the development of the assumptions in (E) above rather than separately.
Ameren Missouri	21.040(1)(A)	Strike "and reasonably" so it reads "The electric utility shall describe the adequacy of..."	These are not analyses - this is information
Ameren Missouri	21.040(1)(B)	Strike "and reasonably document" and insert "using" so it reads "the electric utility shall describe the adequacy of its existing transmission system with any projects anticipated to be completed under, using at a minimum..."	Same comment - "using" is missing
Ameren Missouri	21.040(1)(C)	Insert "reasonably" so it reads "...describe and reasonably document..."	Consistent with other uses of document (where applicable) above; without qualifier, provision is limitless and burdensome
Ameren Missouri	21.040(1)(F)	Insert "under the respective ISO/RTO tariff" so it reads "The electric utility shall estimate the amount of revenue requirement of regional transmission assets that would be allocated	Regionally allocated projects are assessed at the MISO level, by MISO. AMMO

		under the respective ISO/RTO tariff based on load to the electric utility ."	projects assessed and planned as part of 1(B) are not available for regional allocation
Ameren Missouri	21.040(1)(G)	Strike "report" and insert "analysis" so it reads "...shall provide an analysis for consideration..."	Appears to call for an analysis not a report as such
Ameren Missouri	21.040(1)(G)6	Strike "The estimated fraction of the total cost and amount of each transmission upgrade allocated to the electric utility".	Cost allocation is done at RTO level
Ameren Missouri	21.040(1)H	<p>Insert " The electric utility may use the ISO/RTO transmission expansion plan or its equivalent to satisfy the provisions of this Section (1) in whole or in part if all the following conditions are satisfied:</p> <ol style="list-style-type: none"> 1. The electric utility actively participates in the development of the plan; and 2. The electric utility reviews the ISO/RTOs overall expansion plans each year to assess whether the plans, in the judgment of the electric utility decisionmakers, are in the best interest of Missouri customers. 	

Ameren Missouri	21.040(2)(A)	Strike "the" and insert" If needed to inform preparation of the IRP filing, the" and "reasonably" so it reads" If needed to inform preparation of the IRP filing, the electric utility shall describe and reasonably document the adequacy of its existing distribution system including:"	May be unnecessary to develop ARPs and PRP; documentation requirements should be reasonable not absolute per other language included in the draft rule
Ameren Missouri	21.040(2)(B)	Strike " The electric utility shall describe and document the adequacy of its existing distribution system under, at a minimum, the following scenarios: <p style="margin-left: 40px;">High-growth scenario load forecast at year five (5) pursuant to 20 CSR 4240-21.030(8)(A)3.A.;</p> <p style="margin-left: 40px;">Low-growth scenario load forecast at year five (5) pursuant to 20 CSR 4240-21.030(8)(A)3.A.; and</p> <p style="margin-left: 40px;">A scenario the electric utility selects to stress-test its distribution system."</p>	In contrast to transmission planning (and relevant ISO/RTO requirements), utilities do not have the ability to do this now at this level of detail and it would be extremely burdensome and costly to do so. Moreover, if the system was adequate for all that, there would be no need to continue planning and construction.
Ameren Missouri	21.040(4)	Strike "Such analysis must provide time periods identified as well as magnitudes necessary to avoid or minimize necessary transmission and distribution system upgrades"	It is not possible or necessary in the IRP to be at this level of detail. The analysis would also need to consider the timing, magnitude and the LOCATION of all DSM deployment to answer this.

			That can not be completed in a CEM (nor should it)
Ameren Missouri	21.040(6)	<p>(1) Strike " Affiliate relationships.</p> <p>(A) If any affiliate of the electric utility intends to build transmission within the electric utility's service territory where the project(s) are partially- or fully-driven by economic considerations, then the electric utility shall explain why such affiliate-built transmission is in the best interest of the electric utility's Missouri customers and the electric utility shall describe and document the analysis performed to determine whether such affiliate-built transmission is in the best interest of the electric utility's Missouri customers.</p> <p>(B) The electric utility shall identify and describe any affiliate or other relationship with transmission planning, designing, engineering, building, and/or construction</p>	Provision is unnecessary. For Ameren Missouri, an adjustment is already made if an affiliate builds transmission in Ameren Missouri's service territory. If an issue arose Commission could order study of it coming out of IRP proceeding.

		<p>management companies that the electric utility impacts or may impact. Any description and documentation in section (1), section (2), section (4), and section (5), also apply to any affiliate transmission planning, designing, engineering, building, and/or construction management company or other transmission planning, designing, engineering, building, and/or construction management company currently participating in transmission works or transmission projects for and/or with the electric utility."</p>	
Ameren Missouri	21.050(1)	<ol style="list-style-type: none"> 1. Strike " For purposes of calculating avoided cost, the electric utility shall compare the capacity expansion model of its preferred resource model with the same model excluding all demand-side resources as resource options in the first four (4) years. 2. The electric utility's avoided demand cost 	Strike for inconsistency.

		<p>calculation shall identify specific generation, transmission, or distribution investments that can be reduced, deferred, or avoided as a result of demand-side program implementation." and insert "</p>	
Ameren Missouri	21.050(1)	<p>1. Add "Avoided costs from the immediately prior quadrennial IRP filing (or triennial, if applicable) may be used to satisfy Sections 3(B) and 3(C) in this chapter, for the purposes of developing different combinations of demand-side resources as candidate options in the analysis for the IRP filing in question."</p>	<p>Avoided costs defined in definitions and see section (4) below. Addition 2 (regarding AC from prior IRP) added to create clarity to the timing sequence of avoided costs and to speak to the intent of developing different "tranches" of DSM; statement is necessary to help define the timing and purpose of the Potential Study used to screen in different combinations of DSM resources.</p>
Ameren Missouri	21.050(1)(D)	<p>Strike " The electric utility shall describe and document the electric utility's assumptions concerning the change in baseline conditions, due to the adoption of energy</p>	<p>Striking because this appears unnecessary and there is no understanding of what it is trying to do</p>

		<p>efficiency measures by customers or consumers outside of any utility-sponsored programs, new housing and commercial building starts, appliance saturations, employment growth, federal standards, building codes, and other relevant factors.</p> <p>The electric utility shall provide an estimate of all changes in peak consumption and energy consumption, separately, due to the factors above by calendar month</p> <p>consistent with 20 CSR 4240-21.030 and the assumed program costs in each year of the planning horizon for each potential demand-side program."</p>	
Ameren Missouri	21.050(2)(A)	<p>Strike " (2) Non-MEEIA Demand-Side Resources.</p> <ol style="list-style-type: none"> 1. The electric utility shall identify potential demand-side resources from which demand-side candidate resource options will be identified for the purposes of developing the alternative resource plans. A potential demand-side 	<p>Whether a utility seeks to file a MEEIA application for a given DSM program (or not) has no implication for resource planning - if the utility has a DR program, or has an EE program – and they impact capacity or energy needs – that is what is relevant to resource planning</p>

		<p>resource consists of a demand-side program designed to deliver one (1) or more energy efficiency measures, or energy management measures, including demand response programs. For each demand side resource, the electric utility shall provide: 1. The targeted class of customers; (B) A list of proposed measures, if applicable; 1. Expected life of the measure and duration of impact; 2. All major end uses, including the end uses which are to be considered in the electric utility's load pursuant to 20 CSR 4240-21.030;</p> <p>2. An itemized list of all expected costs of the program for each year of the planning horizon, including, but not limited to, incentives, administration, and evaluation by year; and</p>	<p>not whether the program is part of a MEEIA approved plan - See edit in (3) (which becomes (2)) below</p>
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		<p>3. An estimate of the rate impacts to each customer class by year that includes and identifies an assumption of the timing of the electric utility's general rate cases.</p> <p>(C)The electric utility shall provide all documentation, including any prior evaluations, to substantiate the assumptions in subsection (3)(A).</p> <p>(C)The electric utility shall identify and provide details concerning all demand response programs registered with the electric utility's appropriate regional transmission organization or independent system operator."</p>	
Ameren Missouri	21.050(2)(C)7	<p>Insert " The electric utility shall report the total resource cost test as a measure of system-wide economic efficiency; the electric utility shall also report the participant cost test and utility cost test to assess the impact to participants and non-participants, respectively."</p>	<p>The appropriate way to understand participant and non-participant impacts is via the participant cost test and utility cost test. These Standard Practice Manual tests create consistency in</p>

			evaluation across utilities and within the demand side industry.
Ameren Missouri	21.050(2)(C)7	Strike " An estimate of the rate impacts to each customer class, and separately for program participants and non-participants in each customer class, by year, that includes and identifies an assumption of the timing of the electric utility's general rate cases, inclusion of the electric utility's proposed earnings opportunity, and Demand-Side Investment Mechanism rate cases."	See earlier comment on lack of proper role of this metric in resource planning
Ameren Missouri	21.050(3)(B)	Strike "specific" and insert "the corresponding market-based equivalents of those costs"	Added for consistency with (C) . See also prior comments and the need to ensure that avoided cost calculations are logically consistent with 060 supply side considerations, which also include market purchases
Ameren Missouri	21.050(4)	Add: (2) "The total resource cost test and electric utility cost test shall be used to evaluate the cost effectiveness of the potential demand-side programs.	IRP rule should maintain language on cost-effectiveness testing, consistent with the MEEIA statute. As described in the accompanying comments, cost effectiveness testing is a necessary step to

		<p>(A) For the total resource cost test, in each year of the planning horizon—</p> <ol style="list-style-type: none"> 1. The costs of each potential demand-side program shall be calculated as the sum of all incremental costs of end-use measures that are implemented due to the program (including both electric utility and participant contributions) plus electric utility costs to administer, deliver, and evaluate each potential demand-side program; and 2. For purposes of this test, the costs of potential demand-side programs shall not include lost revenues or electric utility incentive payments to customers. <p>(B) For the electric utility cost test, in each year of the planning horizon—</p> <ol style="list-style-type: none"> 1. The costs of each potential demand-side program shall be calculated as the sum of all electric utility incentive payments plus electric utility costs to administer, deliver, and evaluate each potential demand-side 	<p>developing appropriate bundles or tranches of DSM for inclusion within the IRP analysis.</p>
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		<p>program;</p> <p>2. For purposes of this test, the costs of potential demand-side programs shall not include lost revenues; and</p> <p>3. The costs shall include, but separately identify, the costs of any rate of return or incentive included in the electric utility's recovery of demand-side program costs.</p> <p>(C) The electric utility shall provide results of the total resource cost test and the electric utility cost test for each potential demand-side program evaluated pursuant to subsection (5)(A) and (B) of this rule, including a tabulation of the benefits (avoided costs), demand-side resource costs, and net benefits or costs.</p> <p>(D) If the electric utility calculates values for other tests to assist in the design of demand-side programs, the electric utility shall describe and document the tests and provide the results of those tests.</p> <p>(E) The electric utility shall describe and document how it performed the cost effectiveness</p>	
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		<p>assessments pursuant to section (4) of this rule, and shall describe and document its methods and its sources and quality of information.</p> <p>(F) The electric utility shall describe and document all differences in the treatment of energy and demand reductions associated with demand-side resources utilized in appropriate regional transmission organization or independent system operator forecasting and the assumptions utilized for the IRP filing."</p>	
Ameren Missouri	21.055(1)	<p>(1) Strike " Distributed Energy Resources (DER) Database.</p> <p>(A) The electric utility shall create, and update annually, a database of information on DER for purposes of evaluating current penetration and planning for future changes in the levels of DER.</p> <p>1. The electric utility shall maintain the following information in the database:</p> <p>A. Existing DER and DER aggregations</p>	<p>As Everyg indicated in prior comments, this requirement is unduly burdensome. It should also be noted that the utility does not control whether and to what extent DERs will continue to be available period-to-period.</p>

		<p>interconnected to the electric utility's distribution system regardless of ownership;</p> <p>B. Information characterizing the location according to Geographic Information System coordinates on the distribution circuits where DER are connected;</p> <p>C. Aggregated capacity of DER for each circuit and annual peak load of each circuit;</p> <p>D. Relevant interconnection standard and standby service requirements, as applicable, that specify DER performance capabilities; and</p> <p>E. Summaries of the electric utility's past DER Adoption Potential Studies</p>	
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		<p>performed to comply with section (2) and the DER planning process evaluation under section (3).</p> <p>(B) To the extent that the electric utility is not in possession of all of the information required, the electric utility shall state which information it does not possess, the reason the information is not possessed, and how the electric utility plans to obtain the information for future IRP filings."</p>	
Ameren Missouri	21.055(2)(E)	Strike " The electric utility shall provide a cost-benefit analysis of deployment of DER or DER aggregations as an alternative to traditional resources."	Not necessary, given edits above.
Ameren Missouri	21.060(1)(B)	Strike "(IRP) filings" so it reads "...analyzed in the electric utility's integrated resource plan."	For proper definitional use – see prior comments
Ameren Missouri	21.060(1)(C) 1	Strike "including" and add "which may include but which are not limited to" at end of lead in to list A to D	Should allow flexibility in selecting appropriate metrics to account for new approaches and emphasis on the most important metrics.

Ameren Missouri	21.060(1)(C)	Strike "Expected accredited capacity of each resource by season" and "planning" so it reads " Total portfolio reserve margin"	Reserve margin may be considered a reliability metric in addition to planning reserve margin being considered a reliability standard. Resource accreditations should be considered and treated as input values used in determining the reserve margin, not reliability metrics.
Ameren Missouri	21.060(1)(C)2	Strike "including but" and insert "which may include but which are" so it reads "Quantitative cost metrics, which may include but which are not limited to:"	Should allow flexibility in selecting appropriate metrics to account for new approaches and emphasis on the most important metrics.
Ameren Missouri	21.060(1)(C)2A	Strike "Annual" and insert "Net present value" so it reads "Net present value of revenue requirements..."	The cost metric must account for all costs over the entire planning horizon and must account for the time value of money. Comparison of any number of years of

			<p>annual revenue requirements across multiple plans (and then across multiple values of numerous critical uncertain factors) is unwieldy and does not convey useful information to decision makers or regulators. Of course the annual revenue requirements used to calculate NPVRR will be provided as part of the work papers to facilitate detailed review, but it should not be considered a performance measure.</p>
Ameren Missouri	21.060(1)(C)2	<p>Strike " B. Demand side program costs and forecasted Missouri Energy Efficiency Investment Act (MEEIA) rates, if applicable; C. Annual rate impact for non participants in demand side programs; D. Annual customer rate impact, in total and per rate class for the first eight (8) years based upon the electric utility's most recently proposed class cost of service study allocation or allocation method, and".</p>	<p>Re: DSM programs, Demand-side programs costs should be considered an input assumption for analysis, not a performance measure. If MEEIA rates means specific rates for things like throughput disincentive and program cost recovery, those are simply mechanisms for recovering some portion of the revenue requirement and must be determined through</p>

			<p>ratemaking processes. IRP analysis reflects the total revenue requirement already without regard to inefficiencies in cost recovery or mechanisms used to address them</p> <p>Re: rate impacts, This level of analysis is inappropriate and impractical for IRP analysis. Please see the Company's comments submitted May 7, 2026, pages 10-11 for a detailed discussion of this item.</p>
Ameren Missouri	21.060(1)(C)2	<p>Add: " B. Levelized customer rates; C. Maximum single-year rate change;" to replace former B -D with D to become "Metrics that assess...."</p>	<p>Levelized rates provide a single value for an ARPP that can be used to assess the relative performance of ARPPs. Annual rate impacts over the planning horizon cannot be objectively compared between ARPPs. Future participation by customer across multiple demand-side programs cannot be objectively determined. These metrics provide concise values that can be used for plan</p>

			comparison, including accounting for the time value of money in the case of levelized rates.
Ameren Missouri	21.060(1)(C)3	Strike "including but not limited to: A. Total debt to capital ratio; B. Funds From Operations (FFO) to Debt ratio; C. Debt to Earnings Before Interest, Taxes, Depreciation, and Amortization (EBITDA) ratio; and D. Any other credit metric indicative of the electric utility's ability to finance an alternative resource plan."	Each utility should apply the credit metrics relevant to the assessment of its own credit. While the metrics listed here may or may not be applicable to every utility today, they could change or be replaced over time.
Ameren Missouri	21.060(1)(C)4A	Strike "by resource type and by year"	Probable environmental compliance costs are frequently measured at a portfolio level given the applicability of numerous regulations at the fleet level and the uncertainty of the nature of future regulations. Any mitigation costs for environmental regulations will necessarily be included in the assumptions for resource costs (e.g., SCR, FGD, etc...).

Ameren Missouri	21.060(1)(C)4B.	Strike "by resource type and by year".	See above
Ameren Missouri	21.060(1)(C)4C.	Strike "Annual and"	As with other performance measures, a single measure of emissions is necessary to facilitate alternative plan comparisons. Annual emissions forecasts resulting from modeling are included in work papers.
Ameren Missouri	21.060(2)(A)	Insert "to the extent any share in that shortfall is not hedged" so it reads "...clearing requirements, to the extent any share in that shortfall is not hedged, applicable..."	Ameren Missouri currently has hedges against an LCR shortfall - Historical Unit Considerations and Zonal Deliverability Benefits - that mitigate its exposure to the LCR, which itself is not a stand-alone requirement but a measure that can affect the market clearing price of capacity.
Ameren Missouri	21.060(2)(B)	Insert "to the extent that differences in large loads are not reflected in different ARP's or in contingency plans"	Need a way to distinguish between load changes that help to define a different plan/portfolio and those that can affect the performance of any/all plans/portfolios.

Ameren Missouri	21.060(2)(B)2F	Strike "earnings opportunity, throughput disincentive,"	Throughput disincentive is irrelevant to IRP analysis since it is an artifact of inefficient cost recovery that is addressed through MEEIA. The utility revenue REQUIREMENT analysis does not reflect any lost recovery as a result of changes in sales due to demand side programs. The earnings opportunity, to the extent there is one, is determined through MEEIA cases and need not be considered an uncertain factor. These are distinguished from program marketing costs, which are an input to the IRP analysis and carry some level of uncertainty.
Ameren Missouri	21.060(2)(B)4,5	Strike "4. Extreme weather" and "5. Economic downturn".	Re: extreme weather: This is better handled as part of load uncertainty. It may also, or alternatively, be handled as part of the determination of reliability requirements, including as part of the capacity balance. Should have flexibility to determine

			<p>how best to address; re: economic downturn: Impossible to predict with any degree of accuracy. Long-term economic assumptions can't account for the timing and/or depth of such events or whether they occur at all. Basing planning decisions on any forecast for such events is impractical and ill-advised.</p>
Ameren Missouri	21.060(2)(C)	Add "and" and strike "and document" so that it reads "develop and describe alternative..."	An ARP is not an analysis
Ameren Missouri	21.060(3)(H)	Strike "and document" and insert "describe"	No analysis here - just a qualitative evaluation
Ameren Missouri	21.060(3)(H)3.	Strike "and local clearing requirements" so it reads "How reserve margins are enforced..."	The CEM is agnostic to where resources are located, so LCR has no relevance here.
Ameren Missouri	21.060(3)(I)	Strike "and document"	No analysis here - just a qualitative evaluation
Ameren Missouri	21.060(3)(L)4.B.	Insert "or portfolio"	Many mandates are portfolio-level mandates.

Ameren Missouri	21.060(3)(L)4.D.	Strike "An explanation of how the proposed resources satisfy the need; and "	Not necessary with the change to B.
Ameren Missouri	21.060(3)(L)5.A.	Strike "A citation for each applicable statute, administrative code, or regulatory or judicial order;"	If there is no legal mandate, this information does not exist.
Ameren Missouri	21.060(3)(L)5.B.	Insert "or portfolio" and strike "cited"	
Ameren Missouri	21.060(3)(L)5.D.	Strike "An explanation of how the proposed resources satisfy the need".	
Ameren Missouri	21.060(4)(A)	Strike "shall" and insert "may"	If all plans are carried into risk analysis, this step is not necessary. This provision seems to be included to provide the flexibility to pare down the set of plans for risk analysis, so it shouldn't be made a hard and fast requirement.
Ameren Missouri	21.060(4)(B)2.B.	Strike "demonstrate", and "best" and insert "describe how" so it reads "The electric utility shall describe how the modeling tools used are appropriate for the system size, complexity, and market participation of the electric utility and are consistent with the current industry practices,"	Changed demonstration to description for purposes of reporting practicality. Due to the time and expense involved in acquiring software, putting it in production, and developing

			competency with modeling tools, whether or not such tools are explicitly mandated, it may not always be possible to guarantee that current tools represent the absolute objective best practices.
Ameren Missouri	21.060(4)E.	Strike "and document"	Not analysis
Ameren Missouri	21.060(4)(C)	Strike "3", and "and document" and insert "4" so that it reads "Based on the analysis in subsection (4)(B), the electric utility shall describe the methodology and the results..."	Methodology not an analysis
Ameren Missouri	21.060(4)(C)1.	Strike "annual"	Not all performance measures will be annual measures. In our view, none should be. The determination of performance measures in section (1) will control.
Ameren Missouri	21.060(5)(A)	Strike "describe and document" and "assessment of the" and insert "identify a" and "list of the" so it reads "The electric utility shall identify a comprehensive list of the risks and uncertainties associated with..."	Can't describe and document an assessment, and what this appears to ask for is a list - then it tells us what to analyze

Ameren Missouri	21.060(5)(B)	Strike "and document"	A methodology is not an analysis
Ameren Missouri	21.060(5)(D)2.A.	Strike "Advancing or delaying deployment of specific resources to access plan resilience to timing changes".	This is more appropriately considered as part of one or more additional alternative resource plan portfolios. For example, a potential delay in a major resource may necessitate examination of a different alternative resource plan portfolio that accounts for such a potential delay.
Ameren Missouri	21.060(5)(D)2.C.	Strike "Accelerated build requirements needed to address near term reliability or compliance needs	This should have already been addressed, to the extent possible, in the development of alternative plans/portfolios.
Ameren Missouri	21.060(5)(D)2.D.	Strike " Reasonable rate case timing to evaluate the effect of early, delayed, or staggered cost recovery on forecasted revenue requirements and customer rate trajectories, where the results shall demonstrate how timing assumptions influence affordability and plan selection;	Rate case timing should not be a consideration in assessment revenue REQUIREMENT (i.e., the revenue required to recover all prudently incurred costs, including a fair return). Please see Ameren Missouri's comments submitted on may 7, 2026,

			pages 10-11 for a discussion of this item.
Ameren Missouri	21.060(5)(D)2.E.	Strike "other factors" and insert "relevant emerging factors"	See earlier comments about definition of relevant emerging factors
Ameren Missouri	21.060(5)(E)	Strike "and document"	Not an analysis
Ameren Missouri	21.060(5)(E)1.B.	Strike "and document" and insert "and provide any documentation relied upon for the assumptions" so it reads "Describe the data sources and assumptions supporting that range and provide any documentation relied upon for the assumptions;"	Data sources and assumptions are not an analysis but reasonable to provide documentation underlying them if relied upon
Ameren Missouri	21.060(5)(E)1.D.	Strike "and document"	Not an analysis
Ameren Missouri	21.060(5)(F)	Strike "conduct" and "studies" and insert "analyze and report" and "metrics" so it reads "The electric utility shall analyze and report LOLE and EUE metrics for year (5) of the planning horizon for each alternative resource plan that has undergone risk analysis"	Edited for clarity of the presumed intent. A “study” implies a much more involved effort akin to the LOLE study conducted by MISO (i.e., determining planning reserve margins, accreditations, etc.). In contrast, the LOLE and EUE metrics can be determined for alternative resource plans through modeling without a separate study.

Ameren Missouri	21.060(5)(G)	Strike "updated", "annual", and "over the planning horizon" and insert "that includes" so it reads "...shall provide a table that includes each alternative resource plan that has undergone risk analysis, summarizing each alternative resource plan's performance measures, as set forth in section (1)."	<p>One table for all alternative plans rather than a table for each plan.</p> <p>Not all performance measures will be annual measures. In our view, none should be. The determination of performance measures in section (1) will control.</p>
Ameren Missouri	21.060(5)(H)	Strike "four (4)"	Strictly requiring 4 (not 5, not 3) ignores that there may be a natural break between "top plans" and the rest.
Ameren Missouri	21.060(5)(I)	Insert "top" and "identified in subsection (1)(H)"	Should be focused on the alternative plans that are in the running to be selected as the preferred resource plan.
Ameren Missouri	21.060(6)(B)1.	Strike "including" and insert "which may include"	See next comment below
Ameren Missouri	21.060(6)(B)1.C.	Strike "all"	It may not be reasonable to test for changes in tax incentives for natural gas-fired turbines, for example.

Ameren Missouri	21.060(6)(B)2.A.	Insert "and" and strike "and document"	Not an analysis
Ameren Missouri	21.060(6)(C)2.	Strike "s" in "scenarios"	For agreement in number.
Ameren Missouri	21.060(6)(D)	Insert "Respecting its internal decision-making process" and "the electric utility shall" and strike "describe and document its internal decision making process" so it reads "Respecting its internal decision-making process, the electric utility shall"	Series of actions utility is to take - using correct verbs below
Ameren Missouri	21.060(6)(D)1.	Insert "Description" and strike "describe"	Series of actions utility is to take - using correct verbs
Ameren Missouri	21.060(6)(D)2.	Insert "Provide a" and "and documentation underlying the analysis" so it reads "Provide a summary of key findings from quantitative analysis and documentation underlying the analysis and stakeholders' feedback that influenced preferred resource plan selection;"	Series of actions utility is to take - using correct verbs
Ameren Missouri	21.060(6)(D)3	Strike "Explanation of" and insert "Explain"	Series of actions utility is to take - using correct verbs

Ameren Missouri	21.060(6)(D)4	Strike "Specification" and insert "Specify"	Series of actions utility is to take - using correct verbs
Ameren Missouri	21.060(6)(D)5	Insert "Provide"	Series of actions utility is to take - using correct verbs
Ameren Missouri	21.060(6)(D)6	Strike "Quantification" and insert "Quantify", and strike "at a minimum" and "annual" and insert "the net present value of" so it reads "Quantify the expected value of better information concerning the critical uncertain factors that affect the performance of the preferred resource plan, as measured by the net present value of utility revenue requirements; and"	If an uncertain factor is not critical, there is no value to better information regarding that uncertain factor, by definition.
Ameren Missouri	21.060(6)(D)7	Insert "Provide a"	Series of actions utility is to take - using correct verbs
Ameren Missouri	21.060(6)(E)	Strike "four (4)"	See previous comment regarding top plans.
Ameren Missouri	21.060(6)(E)4	Strike " Present results for both the implementation period and full planning horizon;"	Isolating four years out of the full planning horizon provides no useful information for decision making.
Ameren Missouri	21.060(6)(E)5, 6	Strike " Include the reliability metrics specified in subparagraph (1)(C)1.A. and (1)(C)1.B. based on studies conducted for years three (3), five (5), and ten (10) of the	Performance measures are covered in (E) already. This is duplicative.

		planning horizon;" Strike " Include financial performance measures specified in paragraph (1)(C)3. annually through year ten (10) of the planning horizon;"	
Ameren Missouri	21.060(6)(E)7, 8	Strike " Include expected transmission costs, including potential upgrades for load and interconnection of supply-side resources; and" Strike " Include expected distribution costs, including potential upgrades for load and interconnection of distributed energy resources."	These are inputs, not results.
Ameren Missouri	21.060(6)(F)	Strike "four (4)"	See previous comment on top plans.
Ameren Missouri	21.060(6)(F)1.C.	Strike "by class based upon the electric utility's most recently proposed class cost of service allocation factors;" Strike "Reasonable rate case timing scenarios; and" Strike "Inclusion of regulatory treatments of cost that the electric utility intends to request"	Class-level rates, rate case timing, and regulatory treatments are best handled in rate cases for the reasons stated in our comments on 5/7/2026.
Ameren Missouri	21.060(6)(G)	Strike "The electric utility shall discuss the modeled impacts of rate changes on future electric loads and the derivation of elasticity assumptions"	Price elasticity is considered as part of the load analysis and forecasting and should

			be discussed as part of that section.
Ameren Missouri	21.060(6)(H)	Insert "in its work papers"	This is an enormous amount of data.
Ameren Missouri	21.065(1)(B)	Insert "to the extent known at the time of filing", "or specified quantities of supply-side resources by resource type for which construction is expected to begin during the implementation period" and "and any documentation relied on respecting those features" and strike "and document"	<p>Some resources for which implementation is expected to commence during the 4-year implementation period (which begins approximately one year after filing) may not be known with specificity (e.g., resource implementation may require additional bids and contract negotiations).</p> <p>Strike "Document" because it is not an analysis</p> <p>SB4 contemplates both specific resources and quantities of resource types without explicit project specifications.</p>

Ameren Missouri	21.065(1)(B)8.	Strike "Whether the electric utility is seeking limited inquiry"	See below – if construction is planned to start within implementation period then limited inquiry CCN is available as a matter of law
Ameren Missouri	21.065(1)(C)	Strike " For any supply-side resource the electric utility requests the commission to consider for limited inquiry, the electric utility shall provide the following, in addition to the information requested in subsection (1)(B):	SB4 contemplates implementation of both specific projects and quantities of resources by resource type without distinguishing the treatment of one from the other. Details can be provided at the time of filing to the extent known. This should not preclude a determination by the Commission that resources or quantities of resources by type in the utility’s implementation plan are part of a reasonable and prudent preferred resource plan, and are therefore eligible for the limited inquiry CCN process.
Ameren Missouri	21.065(1)(D)2.	Insert " Plans for implementing demand-side resources, including expected requests for approval of programs pursuant to the Missouri Energy Efficiency Investment Act.	

Ameren Missouri	21.065(1)(D)5.	Insert "resource related"	Should be limited to those investments with a nexus to resource planning.
Ameren Missouri	21.065(1)(D)6B.	Strike "document and provide" and insert "provide supporting documentation relied upon together with a" so that it reads "For each short-term alternative, the electric utility shall describe and provide supporting documentation relied upon together with a summary table including the"	One would not document a summary table – edits to reflect what appears to be intended
Ameren Missouri	21.065(2)(B)4.	Insert "or quantity of resources by type"	SB4 contemplates both specific projects and quantities of resources by type.