

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of a Working Case for the)
Development of Rules Regarding)
Integrated Resource Planning for) Case No. EW-2026-0091
Electrical Corporations as Required by)
Section 393.1900, RSMo)

COMMENTS OF GOOGLE, LLC

COMES NOW, Google, LLC (“Google”) and respectfully submits the below comments in response to the Notice of Updated Draft IRP Rules for Stakeholder Comments (“Updated Draft”), submitted by the Missouri Public Service Commission (“Commission”) in the above captioned Case on May 22, 2026.

1. Google appreciates the Commission’s efforts to work with stakeholders to develop new Integrated Resource Planning (“IRP”) Rules pursuant to the relevant provisions of Missouri Senate Bill 4 (2025).

2. While Google generally agrees with the Commission’s priorities and revisions as outlined in the Updated Draft, there are a few portions of the Updated Draft for which Google requests additional clarification and potential edits. In accordance with the instructions that accompanied the Updated Draft, Google provides its comments in the following table:

Stakeholder	Rule Citation	Requested Change	Summary of Comment
Google	20 CSR 4240-21.015(15)	Clarify use of 12CP and 4CP.	Across RTOs and ISOs in the US, the definition of coincident peak has/is evolving to better reflect the dynamism experienced in today’s energy markets. Google requests that the Commission expand further upon its intended meaning of coincident peak, and specifically share if it is the Commission’s intention to

			use 12CP, 4CP, or another definition of critical peak, and how and whether this coincident peak will align with SPP and MISO definitions for usage
Google	20 CSR 4240-21.020(2)(B)(9)	Clarify number and schedule of meetings and technical workshops.	While Google appreciates The Commission’s requirement for utilities to host stakeholder meetings and technical conferences to address issues outlined in the draft rules, Google requests that the Commission be more specific in the number of meetings and technical workshops that will be required.
Google	20 CSR 4240-21.035(1)(A)	Provide flexibility regarding the size of new technologies.	Google Suggest revising the definition to include language that focuses on "commercially viable" technologies vs technologies that have reached a 10 MW deployment threshold. While Google recognizes the need for some cutoff, a 10 MW cutoff would limit newer technologies that could provide significant value, even if the operational pilot is less than 10 MW (e.g. small scale transmission/distribution resources that could support system reliability, or certain medium or long duration storage technologies).

WHEREFORE, Google respectfully requests that the Commission accept these comments and for all other relief to which Google is entitled.

Respectfully submitted,

By: /s/Andrew O. Schulte

Andrew O. Schulte (#62194)
Frank A. Caro, Jr. (#42094)
900 West 48th Place, Suite 900
Kansas City, Missouri 64112
(816) 691-3731
aschulte@polsinelli.com
fcaro@polsinelli.com

ATTORNEYS FOR GOOGLE, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above Comments have been emailed this June 22, 2026, to all counsel of record.

/s/Andrew O. Schulte
Andrew O. Schulte