

Respectfully,

/s/ Nicole Mers

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 22nd day of June 2026.

/s/ Nicole Mers

Stakeholder	Rule Citation	Requested Change	Summary of Comment
Renew Missouri	20 CSR 4240-21.015 (9)	<p>Avoided costs means the cost savings obtained by substituting demand-side programs for existing and new supply-side resources.</p> <p>Avoided costs include avoided utility costs resulting from demand-side programs' energy savings and demand savings associated with generation, transmission, and distribution facilities including avoided probable environmental compliance and societal costs.</p>	<p>Renew Missouri supports the addition of consideration of societal costs in avoided cost calculations. Including analysis of the impacts on society in resource planning and demand side resource deployment is a best practice, as recommended by National Association of State Energy Officials.ⁱ Including information that allows for the performance of a societal cost test or a jurisdiction specific test as secondary or additional analysis paints a truer picture of not only the costs the ratepayers receive directly from the utility, but other additional costs caused by the addition of resource.ⁱⁱ</p>
Renew Missouri	21.015 (13)	Capacity means the maximum capability to continuously	Renew Missouri suggests adding store to clarify that accredited storage projects count for capacity purposes, as SPP and MISO allow.

		produce or store and deliver electric power.	
Renew Missouri	21.015 (19)	<p>Demand-side program means any program conducted by the utility to modify or shift the net consumption of electricity on the retail customer's side of the electric meter.an organized process for packaging and delivering to a particular market segment a portfolio of end-use measures that is broad enough to include at least some measures that are appropriate for most members of the target market segment.</p>	<p>Renew Missouri recommends replacing the proposed language with the definition of demand side program from the MEEIA Statute, 393.1075 (3), with the addition of the term “shift” to recognize the value demand response programs add, even if a customer’s overall usage is not lower, just off-peak. Renew Missouri suggests using the this minimally modified statutory language and less ambiguous. “Broad” and “some” are nebulous terms without agreed upon consensus. Furthermore, the term “market segment” or “targeted market segment” are not defined here and may be open to interpretation as well.</p> <p>Since demand-side resources are defined in a separate definition, Renew Missouri has not included the non-inclusive list of what qualifies as a demand-side resource from 393.1075(3) to streamline and reduce duplicative language.</p>
Renew Missouri	21.015 (20)	Demand-side resources means resources designed to	Renew Missouri recommends adding “or shift” to the definition to align it with the MEEIA statute definition and to acknowledge that shifting power, even without a total

		<p>reduce or shift electricity consumption, particularly during peak demand times, and can include energy efficiency programs and demand response programs.</p>	<p>reduction in consumption, to off-peak hours can provide benefits to the system.</p>
<p>Renew Missouri</p>	<p>21.015 (50)</p>	<p>(50) Large load metrics means the following metrics that together describe whether, when, and to what level large load projects materialize and use electricity over time: (A) Project realization means the rate at which large load projects included in the load forecast are placed in service. (B) Energization date means the schedule for</p>	<p>Renew Missouri recommends adding resource mix as a required large load metric. As large load additions may significantly impact future resource needs, resource planning decisions, and customer costs, utilities should identify the generation resource type(s) expected to serve new large loads and disclose the percentage of energy expected to come from renewable resources. This information will improve transparency regarding whether large load growth is being met through new generation resources, existing system resources, market purchases, or renewable energy procurement.</p>

		<p>when a large load will be placed into commercial operation, including anticipated delays. (C) Load realization means the forecast peak load once new large load projects fully ramp from energization to maximum operation and may be expressed as a percentage of requested or contract peak load. (D) Load ramping means the monthly or annual forecast of demand during the period between initial project energization and reaching full forecast peak load. (E) Load factor means the</p>	
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		<p>actual energy use as a proportion of peak demand. (F)</p> <p>Load shape means providing more detailed energy use information such as a monthly and/or hourly schedule, (G)</p> <p>Resource mix means identification of the generation resource type(s) expected to serve the large load, including but not limited to natural gas, coal, nuclear, solar, wind, hydroelectric, energy storage, market purchases, or other resources, and the percentage of the large load's energy requirements</p>	
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		expected to be served by the resources.	
Renew Missouri	21-.015(52)	(52) Levelized Cost of Energy (LCOE) is an analytical metric used to compare the cost competitiveness of various energy generation technologies by calculating the constant price per unit of energy (usually per Megawatt-hour) required to break even over a plant's assumed lifetime	Renew Missouri suggests adding a definition of levelized cost of energy. This definition is from Lazard, who produces a widely utilized yearly examination of levelized costs of energy across the energy industry. ⁱⁱⁱ
Renew Missouri	21.020 (2)(c)(4)	Identification of significant proposed federal and state environmental regulations, laws or rules, and an explanation of how those regulations law,	Renew Missouri suggests adding impact to clearly capture proposed new or modifications to existing regulations, laws, and/or rules to capture changes that may not be directly applicable to a resource type, but instead have indirect impacts. For example, proposed tariffs may increase the cost of construction materials without being a rule, regulation, or law specifically governing or addressing utility projects.

		<p>laws, or rules apply to or impact the applicable resource type, and a description of the expected timeframe when each proposed regulation, law or rule will take effect;</p>	
Renew Missouri	<p>21.025 (8) Standards and Dataset Management</p>	<p>(8) The electric utility shall provide staff, and public counsel, and a limited number of intervening stakeholders reasonable access to modeling software, tools, standards, formatting and data files the electric utility used for the purpose of verifying results or performing</p>	<p>In addition to Staff and Public Counsel, require utilities to provide reasonable access to modeling software, tools, standards, formatting, and data files to intervening stakeholders subject to appropriate confidentiality protections. The number of licenses and any joint/collaborative use of such licenses can be determined in the pre-IRP stakeholder process.</p>

		<p>independent modeling runs, as the commission designated in conformance with section 393.1900.1(5) RSMo. The electric utility shall bear all costs of compliance for this section.</p>	
<p>Renew Missouri</p>	<p>21.030(1) (k)</p>	<p>(K) The electric utility shall ensure the forecast accounts for the effects of electricity prices, real price of competitive energy resources and technologies, including customer adoption of distributed energy resources, energy efficiency technologies, and</p>	<p>Renew Missouri recommends clarifying that electric utility load forecasts should account for the real price of competitive energy resources and technologies, including customer adoption of distributed energy resources, energy efficiency technologies, and electrification alternatives. As customer options continue to evolve, accurate forecasting requires consideration of how emerging technologies and changing customer behavior may impact future electricity demand. Incorporating these factors will help ensure IRP forecasts reflect realistic load growth assumptions and support cost-effective long-term resource planning.</p>

		<p>electrification alternatives, and rate design on customer usage.</p> <p>The electric utility shall include the price elasticity of demand, and the impacts of approved rate structures such as time-of-use rates, demand charges, and dynamic pricing mechanism.</p>	
Renew Missouri	21.030(2)(K)(3)	<p>3. The electric utility shall describe and document a forecast of net system load profiles for each year of the planning horizon.</p> <p>The electric utility shall ensure the net system load forecast is consistent with the electric</p>	<p>This proposed revision ensures that electric utility load forecasts accurately account for the impact of distributed energy resources, including customer-owned renewable generation, energy efficiency, demand response, beneficial electrification, and energy storage. Incorporating these resources into net system load forecasts will improve transparency, better reflect future system needs, and help prevent unnecessary investments in generation or infrastructure by recognizing resources that can reduce or shift peak demand.</p>

		<p>utility's forecasts of monthly energy and peak demands at the time of summer and winter system peaks for each customer class.</p> <p>The forecast shall account for the impacts of existing and reasonably anticipated distributed energy resources, including customer-owned renewable generation, energy efficiency, demand response, beneficial electrification, and energy storage resources. The forecast shall also evaluate how these</p>	
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		<p>resources may reduce, shift, or otherwise modify system peak demand and energy requirements over the planning horizon.</p>	
<p>Renew Missouri</p>	<p>21-.035 (1)(D)</p>	<p>(D) The electric utility shall describe and document its analysis including provision of cost and performance information sufficient to fairly analyze and compare each of these existing and potential supply-side resource options established in subsection (1)(A), including, but not limited to, those attributes needed to individually assess the following cost</p>	<p>Renew Missouri recommends specifying best sources of information to support the analysis. Because resource planning outcomes are highly sensitive to underlying cost assumptions, requiring consistent and transparent sourcing of resource inputs would improve comparability across technologies and reduce the potential for reliance on unsupported or outdated assumptions. The utility should strive to use the same source for resource cost and performance assumptions across resources and should be transparent about the alternative approach when one source does not sufficiently cover all resources.</p> <p>Renew Missouri recommends adding a separate category to collect fuel procurement information and allow that information to be readily identifiable and comparable among candidate resources. Without interconnection or pipeline access, resources cannot connect to the grid to be properly energized to produce power for customers. Therefore, these procurement costs, which can be substantial and require distinct permitting queues and approvals, can be a major cost category to evaluate in selecting resources. Furthermore, a true accounting of</p>

		<p>categories by resource.</p> <p>Information should be supported by a request for information, request for proposal, independent market benchmark, or comparable third-party data source.:</p> <ol style="list-style-type: none"> 1. Capital cost, including, for capital projects that are reasonably expected to result in the extension of the retirement date of each generating unit; 2. Fixed and variable operation and maintenance costs; 3. Probable environmental compliance costs; and 4. Unit 	<p>variable fuel costs, and information regarding the volatility, gives a more complete cost estimate than just capital costs alone. Additionally, these items are ongoing and required, which not all categories of variable operating and maintenance costs may be, which further supports a separate cost category to increase transparency and facilitate resource to resource comparison.</p>
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		<p>characteristics and attributes; and 5. Interconnection and Fuel Procurement costs, including but not limited to estimated interconnection costs and timelines, pipeline reservation, timelines, and capacity; estimates of variable fuel expense and risk of volatility in fuel expense.</p>	
Renew Missouri	21-.035-(2)(C)(1)	<p>Cost rankings of each potential supply-side resource option which shall be based on estimates from of the installed capital costs plus fixed and variable operation and</p>	<p>Renew Missouri suggests that cost categories in 21.035(1)(D), as modified by Renew Missouri's change, provide a fuller, more balanced apples to apples comparison among resource types. It will also provide a better estimate of the lifetime or all in costs of resources for planning purposes.</p>

		<p style="text-align: center;">maintenance costs cost categories listed in 20 CSR 4240-21.035 (1)(D) ;</p>	
Renew Missouri	21.-.035(2)(E)(4)	<p>Improvements, including grid enhancing technologies, on the electric utility’s transmission and distribution system to increase efficiency and/or capacity and reduce power losses;</p>	<p>Renew Missouri recommends utilities analyze the potential to unlock additional capacity transfers or purchases via transmission improvements or grid enhancing technology. A recent Grid Strategies report details that for every dollar spent on transmission, customers can see resulting benefits of \$4.70.^{iv} The report also notes transmission is a cost effective, reliability improving, and quicker to deploy way of addressing load growth and resiliency.^v</p>
Renew Missouri	21-.050(1)	<p>(1) Demand-Side Resources Optimization. (A) In order to properly optimize the amount of demand-side resources, the electric utility shall designate all Missouri jurisdictional demand-side resources as</p>	<p>Renew Missouri suggests the utilities run analyses to estimate the impact on their operating conditions the removal or reduction in funding for state and federal weatherization and energy efficiency programs. Not only could this information impact the market potential, but it may also identify other planning assumptions, such as cash flow, energy usage, etc, that may ultimate impact what a well-rounded portfolio of measures looks like. Much like probable environmental compliance costs may impact the overall costs and selection of supply side resources, potential regulatory changes in weatherization and energy efficiency programs on a state and federal level may impact an overall level of demand side measures.</p>

		<p>candidate resource options in its capacity expansion model on the basis of estimated seasonal energy, seasonal demand savings and expected program costs. 1. 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 calculation shall identify specific generation,</p>	
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		<p>transmission, or distribution investments that can be reduced, deferred, or avoided as a result of demand-side program implementation.</p> <p>(B) The electric utility shall model Missouri Energy Efficiency Investment Act (MEEIA) demand-side resource options separately from non-MEEIA demand-side resource options.</p> <p>(C) For determining the optimal amount of demand-side resources, the electric utility shall exclude distributed energy resources that are included in the 20 CSR 424021.055 analysis as a</p>	
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		<p>demand-side resource. (D) The electric utility shall describe and document the electric utility's assumptions concerning the change in baseline conditions, due to the adoption of energy 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. The electric utility shall provide an estimate of all</p>	
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		<p>changes in peak consumption and energy consumption, separately, due to the factors above by calendar month 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> <p>(E) The utility shall analyze, describe and document the impact on the utility's revenue requirement and current usage levels any proposed changes in budgets, including elimination, of state or federal funded</p>	
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		weatherization or efficiency programs, such as LIHEAP, LIWAP.	
Renew Missouri	21-.050 (3) (B)(1)	The electric utility shall design the research activities to provide a solid foundation of information applicable to the electric utility about how and by whom energy-related decisions are made, and about the most appropriate and cost-effective methods of influencing these decisions in favor of greater long-run energy efficiency and energy management impacts. The utility may include non-energy benefits	This proposed revision ensures demand-side resource evaluations account for the full range of benefits provided by energy efficiency and demand-side programs. Including reasonably quantifiable non-energy benefits will improve resource planning accuracy by recognizing participant, utility system, and other measurable benefits that may reduce overall costs and improve outcomes for customers.

		<p>such as participant, utility system, and other measurable benefits, or the results of other demand side evaluation tests, as long as the utility verifies, explains, and provides evidence supporting the validity of the information, its incorporation into the planning process and its applicability to the utility's service territory.</p> <p>The electric utility may compile existing data or adopt data developed by other entities, including government agencies and other utilities, as</p>	
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		<p>long as the electric utility verifies the applicability of the adopted data to its service territory;</p>	
	<p>21-.050(3)(C)</p>	<p>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 MEEIA demand-side resource consists of a demand-side program designed to modify or shift the net consumption of electricity on the retail customer's side of the electric meter, including but not</p>	<p>Renew Missouri recommends adding “or shift” to the definition to align it with the MEEIA statute definition and to acknowledge that shifting power, even without a total reduction in consumption, to off-peak hours can provide benefits to the system. This is aligned with Renew Missouri’s proposed change to 21.015(20).</p>

		limited to energy efficiency measures, rate management, demand response, and interruptible or curtailable load. For each MEEIA demand-side resource, the electric utility shall provide:	
Renew Missouri	21-.060(1)(C)(2)	2. Quantitative cost metrics, including but not limited to: A. Annual revenue requirements, with and without any authorized financial or performance incentives for demand-side resources; B. Demand-side program costs and forecasted Missouri Energy Efficiency Investment Act (MEEIA) rates, if applicable; C.	This proposed revision improves transparency in alternative resource plan evaluation by requiring utilities to provide standardized cost comparisons, including levelized cost of energy and long-term fuel and operating cost risks. Including these metrics will allow stakeholders and the Commission to better compare resources with different cost structures and ensure preferred resource plans appropriately consider long-term customer impacts

		<p>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 E. Metrics that assess market exposure, including dependence on volatile fuel prices and market purchases; and (F) The electric utility shall describe and document the comparative cost of each resource portfolio,</p>	
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		<p>including the levelized cost of energy (LCOE) of applicable generation resources, expected fuel and operating cost exposure, and sensitivity to future commodity price risks. The analysis shall ensure resources with no fuel costs, including renewable generation, are evaluated consistently against resources with ongoing fuel price uncertainty.</p>	
Renew Missouri	21-.060 (2)(B)(2)(B)	<p>Costs and Financial Impacts: A. Future interest rate levels and other credit market conditions</p>	<p>Renew Missouri recommends adding fuel cost and procurement information to allow that information to be readily identifiable and comparable among plans. Without pipeline access, resources cannot connect to the grid to be properly energized to produce power for customers. Therefore, these procurement costs, which can be substantial and require distinct permitting queues and</p>

		<p>that can affect the electric utility's cost of capital and access to capital; B. Fuel procurement including but not limited to pipeline reservation, timelines, and capacity; fuel purchasing and estimates of variable fuel expense and risk of volatility in fuel expense prices; C. Siting, interconnection, and permitting costs and schedules for new supply-side resources and supply-side-related transmission facilities for the electric utility, for the appropriate RTO/ISO, and/or other</p>	<p>approvals, can be a major cost category to evaluate in selecting resources. Furthermore, a true accounting of variable fuel costs, and information regarding the volatility, gives a more complete cost estimate than just capital costs alone. Additionally, these items are ongoing and required, which not all categories of variable operating and maintenance costs may be, which means accounting for it here increases transparency and facilitates plan comparison. This suggestion also aligns with Renew Missouri's proposed changes to 21-.035 (1)(D).</p>
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		<p>transmission systems D. Construction costs and schedules for new generation and generation related transmission facilities for the electric utility, for the appropriate RTO/ISO, and/or other transmission systems; E. Fixed operation and maintenance costs for new and existing supply-side resources; and F. Electric utility marketing, earnings opportunity, throughput disincentive, and delivery costs for demand-side programs.</p>	
Renew Missouri	21.060(4)(B)(1)	1. Treat supply-side and demand-side resources on a logically	This provision already requires supply-side and demand-side resources to be evaluated on a logically consistent and economically equivalent basis. Additional clarification regarding data sources and assumptions would further

		<p>consistent and economically equivalent basis, such that the same types or categories of costs, benefits, and risks shall be considered and such that these factors shall be quantified at a similar level of detail and precision for all resource types; utilizing comparable data sources and equivalent treatment of costs, risks, and performance assumptions.</p>	<p>ensure that competing resource alternatives are evaluated consistently and transparently.</p>
<p>Renew Missouri</p>	<p>21-.060 (6)(E)</p>	<p>(E) The electric utility shall summarize the results of its evaluation for the top four (4) alternative resource plans using a</p>	<p>Renew Missouri recommends adding fuel cost and procurement information to allow that information to be readily identifiable and comparable among plans. Without pipeline access, resources cannot connect to the grid to be properly energized to produce power for customers. Therefore, these procurement costs, which can be substantial and require distinct permitting queues and approvals, can be a major cost category to evaluate in selecting resources. Furthermore, a true accounting of</p>

		<p>comparative scorecard or equivalent matrix that presents all of the performance measures and risk scenarios in a clear, reproducible format. The scorecard shall—</p> <ol style="list-style-type: none">1. Display both expected values and measures of risk or variability for each metric;2. Identify tradeoffs among cost, reliability, risk, and environmental outcomes;3. Clearly distinguish modeled results from qualitative assessments;4. Present results for both the implementation period and full planning horizon;	<p>variable fuel costs, and information regarding the volatility, gives a more complete cost estimate than just capital costs alone. Additionally, these items are ongoing and required, which not all categories of variable operating and maintenance costs may be, which means accounting for it here increases transparency and facilitates plan comparison. This suggestion also aligns with Renew Missouri’s proposed changes to 21-.035 (1)(D) and 21-.060 (2)(B)(2)(B).</p>
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		<p>5. 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 planning horizon;</p> <p>6. Include financial performance measures specified in paragraph (1)(C)3. annually through year ten (10) of the planning horizon.</p> <p>7. Include expected transmission costs, including potential upgrades for load and interconnection of supply-side resources; and 8. Include expected</p>	
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		<p>distribution costs, including potential upgrades for load and interconnection of distributed energy resources,</p> <p>9. Fuel Procurement costs, including but not limited to pipeline reservation, timelines, and capacity; estimate of fixed fuel costs, estimates of variable fuel expense and risk of volatility in fuel expense.</p>	
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ⁱ The National Association of State Energy Officials (NASEO) has published a National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources. The most current version was updated in 2026 to account for policy and technology changes in the energy field. NASEO states “The National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources provides a comprehensive framework for cost-effectiveness assessment of DERs. The manual offers a set of policy-neutral, non-biased, and economically-sound principles, concepts, and methodologies to support single- and multi-DER benefit-cost analysis (BCA) for: energy efficiency (EE), demand response (DR), distributed generation (DG), distributed storage (DS), and (building and vehicle) electrification. It is intended for use by jurisdictions to help inform which resources to acquire to meet their specific policy goals and objectives.”

Located at <https://naseo.org/nesp/nspm>

ⁱⁱ Section 4-1 through 4-5, Section 6-7.

ⁱⁱⁱ An explanation of levelized cost of energy, as well as the 2025 results, can be located at <https://www.lazard.com/research-insights/levelized-cost-of-energy-plus-lcoeplus/>

^{iv} Page 4. Report located at <https://cleanenergygrid.org/new-report-finds-every-1-spent-on-transmission-returns-up-to-4-70-in-customer-benefits/>

^v Id.