

June 22, 2026

Missouri Public Service Commission
200 Madison Street, P.O. Box 360
Jefferson City, MO 65102

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

Good afternoon,

Clean Grid Alliance (“CGA”) submits this cover letter and the attached Exhibit A in response to the noticed comment opportunity on the revised draft integrated resource planning (“IRP”) rules issued in this docket on May 22, 2026. We thank the commission for hosting the prior stakeholder workshops, for using input received to inform the updated draft rules, and for the instant opportunity to comment. To frame our recommendations broadly, CGA:

- Supports the revised Pre-IRP Proceeding, further recommending only – but critically – that stakeholders are guaranteed a hearing on issues for which consensus is not achieved under rule section 21.020 (Filing Schedule, Filing Requirements, and Proceeding Requirements);
- Recommends further refinements to the large load forecast and base case load forecast approach under rule section 21.030 (Load Forecasting Requirements);
- Urges several modifications that will ensure all viable and reasonable candidate resources, including transmission assets, are fully assessed and fairly evaluated and compared under rule section 21.035 (Supply-Side Resource Analysis);
- Encourages a specific focus on the effects of, and solutions to, transmission constraints caused by congestion on the utility’s transmission system under rule section 21.040 (Transmission and Distribution Analysis);
- Improve the resource acquisition process and ensure cost-competitiveness by implementing a number of recommendations to define, clarify, and describe procurement activities under rule sections 21.010 (General Provisions), 21.015 (Electric Utility Resource Planning Definitions), 21.020, and 21.065 (Implementation Plan Development and Reporting Requirements); and
- Other recommendations to facilitate stakeholder participation; align with IRP best practices; and model effective approaches to reliable, least-cost planning exhibited in other jurisdictions, among other things.

Respectfully submitted this 22nd day of June, 2026.

Emily Piontek
/s/ _____

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