

Stakeholder	Rule Citation	Requested Change	Summary of Comment
Clean Grid Alliance (CGA)	21.010 (2)(C) Resource Planning Objectives	Clarify that the balancing factors are not listed in any particular order of importance by adding such a statement to this section.	The numerical ordering of the balancing factors may suggest they are ranked by order of their importance. RSMo 393.1900 (“the IRP Statute”) also lists the balancing factors in numerical order but does not indicate any ranking by importance. Thus, the IRP rules can clarify that the ordering of the balancing factors is not to be understood to indicate the relative importance of any factor over another. The suggested disclaimer would eliminate potential confusion and/or contention.
CGA	21.010 (2)(C)(4) Resource Planning Objectives	Specify that power purchase agreements (“PPAs”) and build-transfer agreements (“BTAs”) both constitute qualifying contractual agreements under the assessment of “availability for purchase from third parties of affordable and reliable generation”	The term “availability for purchase from third parties” of generation is used throughout the proposed IRP rules but remains undefined. The phrase “availability for purchase” is too vague, creating a layer of subjectivity. By specifying that both PPAs and BTAs are viable arrangements, the IRP rules would alleviate the risk of utility bias towards a particular contract type over another, allowing for full evaluation of both options.
CGA	21.010 (2)(C)(8) Resource Planning Objectives	Describe parameters for item #8 thus: “Competitive pricing, as determined through the use of a request for information,	“Competitive pricing,” while listed as a balancing factor in the IRP Statute and as a planning objective in section 21.010 (2)(C) of these rules, is undefined. Guidance governing the process of determination that

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		competitive request for proposal, benchmarking to comparable resources, or determination of a qualified third-party evaluator, AND by comparing the costs of utility-owned resources to third-party owned ones of the same resource type”.	resources are competitively priced is critical to both ensuring that cost-effectiveness has been appropriately evaluated and providing transparency to stakeholders.
CGA	21.015 (83) Definitions, “Resource type”	Under this definition, include energy storage systems among the list of eligible resources.	The definition of Energy Storage System “ESS” in this rule section (32) states that ESS may be considered a generating asset; ESS should be listed in (83) for consistency.
CGA	21.015 (92) Definitions, “Supply-side resource”	Under this definition, include transmission assets (i.e., transmission lines and advanced transmission and grid-enhancing technologies).	Transmission assets that are specifically designed to carry resources from other RTOs, such HVDC lines bringing resources into Missouri from SPP, or additional transmission that increases capacity imports, should be considered a supply-side resource as electricity imported onto the system from other regions may bring significant reliability and cost-savings benefits. Alternatively, the rule could cross-reference 20 CSR 4240-21.035 (1) (A).
CGA	21.015 (93) Definitions, “System needs”	Replace peak capacity with peak demand .	Peak demand is an indispensable planning and forecasting metric; the reserve-margin requirements will capture “peak capacity” requirements of the system. As is, the definition risks being redundant.

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CGA	21.020 (2)(C) Pre-IRP minimum filing requirements	Add item #14: “Proposed RFP template & contract template for power purchase agreements, build-transfer agreements.”	The RFP should be subject to greater transparency and regulatory oversight. The procurement type (e.g., all-source), proposal template, and form contract should be reviewed and discussed by stakeholders as part of the pre-IRP Proceeding, and ultimately reviewed and potentially modified by the commission in the order directing the IRP Filing. A stakeholder process for RFPs is outlined in guidance issued by the Michigan PSC and is currently being modeled by DTE. ¹
CGA	21.020 (2)(B)(11)(B) Pre-IRP Proceeding	Amend the language thus: “If consensus is not achieved, the commission shall grant a hearing to any party requesting one.”	Any parties with unresolved concerns from the uncontested phase of the pre-IRP Proceeding should have assurances their positions will be granted due consideration.
CGA	21.020 IRP Proceeding	Add a new provision describing the IRP Pre-Commission Report & Order Sub-Process (as described in the updated IRP process flowcharts). This section should also clarify the terms of intervention (i.e., whether stakeholders not party to	The proposed rules expressly establish an intervention opportunity during the Pre-IRP Proceeding but do not clearly identify a comparable intervention opportunity following submission of the IRP filing itself. Clarifying the availability of intervention rights during the IRP review phase would improve transparency and reduce uncertainty regarding stakeholder participation.

¹ See MPSC Case No. U-20852; the Electric Systems Integration Group and Energy Innovation, “Making the most of the power plant market: Best practices for all-source electric generation procurement”, (April 2020), available at: [All-Source-Utility-Electricity-Generation-Procurement-Best-Practices.pdf](#); and also refer to DTE’s 2026 Renewable Energy Request for Proposals, RFP Development Stakeholder Input Session held on May 4, 2026.

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		the Pre-IRP Proceeding may engage in the IRP Filing Process) and describe the notice and intervention opportunity.	
CGA	21.025 (8) Standards and Dataset Management Requirements	Require the utility to also provide a limited number of modeling licenses to stakeholders. The number of licenses and any joint/collaborative use of such licenses can be determined in the pre-IRP stakeholder process.	For stakeholders to best participate in the resource planning process, access to the same modeling tools is critical to their ability to review, evaluate, and critique the utility’s preferred resource plan. Further, if stakeholders disagree with fundamental modeling inputs, it will be necessary for them to have access to the same modeling tools in order to propose alternative plans for the commission’s consideration.
CGA	21.030 (5)(11) Base Case Load Forecast	Add to item #11 the requirement that the base case load forecast “ should disaggregate the large load forecast by categories of maturity, as described in rule section 21.030(6) ”. Furthermore, the base case load forecast should be limited to only those large	Uncommitted and even moderately uncertain loads should be omitted from the base case load forecast and should not be incorporated into a regulatory process that lays the groundwork for pre-approval of future resources. Such treatment of large load forecasts in IRP is increasingly recommended by analysts, consulting firms, industry experts, and utility regulatory commissions. ²

² See Charles River Associates (“CRA”), “Utility planning best practices: Data center load considerations,” in Missouri PSC Docket No. EO-2026-0088, “Annual IRP update: Appendix A,” pp. 1-2 (filed October 30, 2025); Electric Systems Integration Group (“ESIG”) Large Loads Task Force, “Forecasting for large loads: Current practices and recommendations,” pp. 1-2, accessed at: <https://www.esig.energy/wp-content/uploads/2025/12/ESIG-Large-Loads-Forecasting-report-2025.pdf>; and EFG, “Review of large load tariffs to identify safeguards and protections for existing ratepayers,” (January 28, 2025), pp. 28-29, accessed at: <https://energyfuturesgroup.com/wp-content/uploads/2025/01/Review-of-Large-Load-Tariffs-to-Identify-Safeguards-and-Protections-for-Existing-Ratepayers-Report-Final.pdf>.

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		loads at the Execution Phase.	
CGA	21.030 (6)(B) Large Load Database	The following relevant considerations should be included among the large load project maturity assessment, either as an addendum to item #3 (Execution Phase) or as a new phase: site control and local and state permit approval.	The maturity assessment includes many critical factors contributing to a large load’s likelihood of materializing. However, site control and local and state permit approval are fundamental to a project’s ability to move forward. CGA is aware of several large load projects in MN, for example, that have signed ESAs and IAs with the incumbent utility yet were halted over lack of state permit approval and local permit challenges.
CGA	21.030 (D)(3)(A), (D)(3)(B), and (D)(3)(C) Large Load Forecast	Ensure that site control and local and state permit approvals are considered among the criteria already listed in paragraph (6)(B), whether as an addendum to (6)(B)(3) or as a new phase (as recommended above) for <u>each</u> of the High, Medium, <u>and</u> Low Probability Scenarios.	See previous comment per CGA’s requested change to rule 21.030 (6)(B), above.
CGA	21.035 (1)(A) Screening Analysis Inputs	Amend item #6 thus: “Purchased power from bi-lateral transactions and from organized capacity and energy markets, including from resources in the RTO generator	This language would ensure utilities are considering the full range of potential resources likely to be available over the course of the planning period.

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		interconnection queues that are likely to come online in the plan period.”	
CGA	21.035 (1)(A) Screening Analysis Inputs	Add to item #7 regarding upgraded transmission and distribution systems may include the use of advanced transmission (ATTs) and/or grid-enhancing technologies (GETs).	This rule section should specify that ATTs and GETs are qualifying transmission technologies for supply-side resource planning, given their ability to unlock new transmission capacity by alleviating congestion, among other things.
CGA	21.035 (1)(A) Screening Analysis Inputs	Add new item #11: “New transmission projects (i.e., from regional and/or interregional lines) that increase import/export capacity.”	As noted in 21.035 (1) (A), above. Transmission assets that are specifically designed to carry resources from other RTOs, such HVDC lines bringing resources into Missouri from SPP, or additional transmission that increases zonal capacity imports, should be considered a supply-side resource as imported electricity brings significant reliability and economic benefits.
CGA	21.035 (1)(D) Screening Analysis Inputs	Require that cost and performance assumptions for candidate resource options be supported by the preceding request for information, request for proposal, independent market benchmark, or comparable third-party data source.	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 sources for resource cost and performance assumptions across resource types, and should be transparent about the

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			alternative approach when one source does not sufficiently cover all resources.
CGA	21.035 (1)(D) Screening Analysis Inputs	Add a fifth cost category: “Fuel procurement costs, including estimated commodity prices and fuel transport/pipeline reservation and storage costs.”	Considering only capital, O&M, and compliance costs (included in cost categories 1-3) for thermal generators (or other fuel-based resources) provides only a limited view of the true range of associated costs necessary for those resources to provide associated attributes. By including what CGA has termed “fuel procurement costs” in this assessment, the true cost of investment/reliance on thermal generation is understood for a given resource type.
CGA	21.035 (2)(B)(1) Screening Analysis and Data Provision	Specify that “costs associated with existing supply-side resources” includes the following: fixed and variable O&M and fuel procurement costs (i.e., commodity prices and fuel transport/pipeline reservation and storage costs).	See our comment under the requested change to rule 21.035 (1)(D) directly above this item for CGA’s view on why fuel procurement costs are appropriate to evaluate under this item. In addition, the full range of potential costs should be delineated for clarity and consistency between utility approaches to IRPs and between IRP filings.
CGA	21.035 (2)(B)(2) Screening Analysis and Data Provision	Specify that “probable” costs include the following: capital, fixed and variable O&M, and fuel procurement costs (i.e., commodity prices and transport/pipeline	See previous comments per our requested changes to rules 21.035 (1)(D) and (2)(B)(1), above.

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		reservation and storage costs).	
CGA	21.035 (2)(C)(1) Screening Analysis and Data Provision	In addition to capital costs and fixed and variable O&M costs, include fuel procurement costs (commodity prices and transport, pipeline reservation, and storage costs).	See previous comments per our requested changes to rules 21.035 (1)(D), (2)(B)(2), and (2)(B)(1), above.
CGA	21.040 (1)(A)(2) Transmission Analysis Requirements	Add the bolded term to this item: “All known transmission constraints due to real power, reactive power, power quality, and congestion under current peak demand.”	Utilities should describe and document all sources of transmission congestion, not just real and reactive power or power quality, which may contribute to congestion but do not describe all possible factors creating it.
CGA	21.040 (1)(C) Transmission Analysis Requirements	Add the bolded phrase to this requirement: “The electric utility shall describe and document ... transmission system upgrades that alleviate congestion over the implementation period;”.	Transmission congestion prevents operation of a “viable, reliable, and/or resilient” transmission network, and may negatively affect the operation of supply-side resources, such as by causing their curtailment. While the actions and upgrades listed under (1)(C) items 1-4 are designed to alleviate congestion, the goal of doing so should be directly spelled out.
CGA	21.040 (3)(A) Advanced Transmission Technologies (ATTs) and	Add the bolded phrase to the end of this requirement to assess ATTs: “ including where on the electric	CGA wholly supports this requirement, but recommends this item also require the utility to show <i>where</i> on its system these ATTs would be potentially beneficial, rather

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	Distribution Network Technologies	utility’s transmission and distribution systems these technologies might alleviate congestion.”	than simply assess their availability and cost-effectiveness in a vacuum. ³
CGA	21.040 (3)(B) ATTs and Distribution Network Technologies	Add a fourth item to the cost-benefit analysis: “A description of the impact of adding ATTs onto the transmission and distribution systems for constraints identified in the analyses required by 21.040 (1) and (2).”	As previously discussed under recommendations to this rule section, congestion causes a number of negative impacts to the operation of the utility’s system, including to supply-side resource output. ATTs are capable of alleviating congestion. A cost-benefit analysis of their ability to do so should be required here.
CGA	21.060 (2)(2) Development of ARPs	Add to this list the following fuel procurement costs (as new item G or as additional costs under item B): storage, and pipeline reservation costs.	As noted above, the full range of potential costs for all resource types should be delineated, for all alternative resource plans. The additional items are fundamentally uncertain cost factors that could impact plan performance and cost-competitiveness.
CGA	21.060 (2)(3)(A) Development of ARPs	Add language specifying that PPAs and BTAs both constitute qualifying contractual agreements under the assessment of “purchased power availability”.	See our comment under the requested change to rule 21.010 (2)(C)(4) above (on p. 1 of CGA’s response). In short, this specificity would alleviate the risk of utility bias towards a particular contractual arrangement over others.

³ See Minnesota PUC Docket No. M25-99 for the Biennial Transmission Report planning proceeding as an example of how other utilities are assessing and/or integrating ATTs.

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CGA	21.060 (3)(L) Resources from the Comprehensive Set of Candidate Resources and Demand-Side Resources	Eliminate this entire provision.	All candidate alternative resource plans should be compared on an equivalent basis, and utilizing capacity expansion modeling for only a subset of candidate alternatives risks biasing selection of a preferred plan over alternatives that have not been adequately evaluated.
CGA	21.060 (4)(B)(1) Analysis of Alternative Resource Plans	Specify that all resource technologies shall be evaluated using comparable data sources and receive equivalent treatment for cost, risk, and performance assumptions.	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 ensure that competing resource alternatives are evaluated consistently and transparently.
CGA	21.060 (5)(F) Risk and Uncertainty Analysis	Require LOLE and EUE studies for additional years of the planning horizon, not just at year five. The rules could leave the number of resource adequacy modeling runs to the discretion of the utility but should require the utility to conduct this analysis for years adding large loads or new or replacement generation and/or retiring	A recommended best practice for modeling resource adequacy in IRP is to “repeat the modeling for years in which the utility expects large changes in the system” rather than for a single test year alone. ⁴

⁴ Lawrence Berkeley National Laboratory and Synapse Energy Economics. “Best practice in IRP: A guide for planners developing the electricity resource mix of the future”. (November 2024). See Best Practice 3. Link resource adequacy assessments with resource planning. Accessed at: https://www.energy.gov/sites/default/files/2024-12/best_practices_irp_nov_2024_final_optimized.pdf.

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		generators and at year five, at minimum.	
CGA	21.065 (D)(1) Implementation Plan Development	Specify that the “description of competitive procurement policies the electric utility uses” should include the RFP template, form contract, and schedule(s) for planned procurement activities. Alternatively, these documents and schedule(s) could be specified under (1)(B)(3) of this rule section.	These documents should be included to ensure transparency to the commission, stakeholders, and potential bidders.