

**Denny Hoskins**  
**Secretary of State / Administrative**  
**Rules**  
**RULE TRANSMITTAL**

**745**

Administrative Rules Stamp

**RECEIVED**  
By Administrative Rules at 12:47 pm, Jun 29, 2026

JCAR Stamp

**RECEIVED**  
By JCAR at 4:04 pm, May 28, 2026

Rule Number 20 CSR 4240-23.040  
Use a SEPARATE rule transmittal sheet for EACH individual rulemaking.

Name of person(s) Administrative Rules can contact with questions about this rule:  
Content Nancy Dippell Phone 573-751-8518 Fax 573-526-6010  
Email address Nancy.Dippell@psc.mo.gov

Data Entry Kayla Kliethermes Phone 573-751-4256 Fax 573-526-6010  
Email address Kayla.Kliethermes@psc.mo.gov

Interagency mailing address Public Service Commission, 9<sup>th</sup> Floor Gov. Office Bldg, JC, MO

TYPE OF RULEMAKING ACTION TO BE TAKEN  
 Emergency Rulemaking >  Rule  Amendment  Rescission  Termination  
Effective date for the emergency \_\_\_\_\_

Proposed Rulemaking >  Rule  Amendment  Rescission

- Rule Action Notice
- In Addition
- Rule Under Consideration
- Request for Non-Substantive Change
- Statement of Actual Cost

Order of Rulemaking >  Withdrawal  Adoption  Amendment  Rescission  
Effective date for the order \_\_\_\_\_  
 Statutory 30 days OR Specific date \_\_\_\_\_

Does the Order of Rulemaking contain changes to the rule text?  NO  
 YES—LIST THE SECTIONS/SUBSECTIONS WITH CHANGES:  
Subsections (1)(A), (1)(E) through (1)(K), (1)(M), (1)(P), (1)(R), (1)(S) through (1)(KK) and (3)(D); Section (2); and adding new subsections (1)(I), (1)(J), (1)(R), (1)(X), (1)(JJ), and (1)(KK).



## *Missouri Public Service Commission*

**MAIDA J. COLEMAN**  
Commissioner

**KAYLA HAHN**  
Chair

**JOHN P. MITCHELL**  
Commissioner

**GLEN KOLKMEYER**  
Commissioner

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://psc.mo.gov>

**VACANT**  
Commissioner

Sarah Schappe  
Director  
Joint Committee on Administration Rules  
State Capitol, Room B8A  
Jefferson City, Missouri 65101

### **Re: State Reliability Mechanism (SRM)**

Dear Director Schappe,

#### CERTIFICATION OF ADMINISTRATIVE RULE

I do hereby certify that the attached is an accurate and complete copy of the order of rulemaking lawfully submitted by the Missouri Public Service Commission.

Statutory Authority: *section 393.1080, RSMo 2025*

If there are any questions regarding the content of this order of rulemaking, please contact:

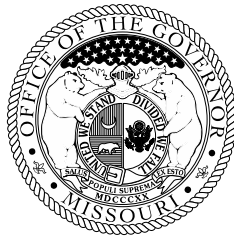
Nancy Dippell, Secretary  
Missouri Public Service Commission  
200 Madison Street  
P.O. Box 360  
Jefferson City, MO 65102  
(573) 751-8518  
[Nancy.Dippell@psc.mo.gov](mailto:Nancy.Dippell@psc.mo.gov)



A handwritten signature in black ink that reads "Nancy Dippell".

Nancy Dippell  
Secretary to the Commission

STATE CAPITOL  
201 W. CAPITOL AVENUE, ROOM 216  
JEFFERSON CITY, MISSOURI 65101



(573) 751-3222  
WWW.GOVERNOR.MO.GOV

*Mike Kehoe*

GOVERNOR  
STATE OF MISSOURI

May 26, 2026

Kayla Hahn, Chair  
Missouri Public Service Commission  
P O Box 360  
Jefferson City MO 65102

Dear Ms. Hahn:

Our office has received the Final Order of Rulemaking for the following regulation:

- **20 CSR 4240-23.040** State Reliability Mechanism (SRM)

Executive Order 25-13 requires this office's approval before state agencies release proposed regulations for notice and comment, amend existing regulations, or adopt new regulations. After our review, we approve submission of the rule and the regulatory impact report (if required) to JCAR and the Secretary of State.

Sincerely,

A handwritten signature in blue ink that reads "Lowell Pearson".

Lowell Pearson  
General Counsel

**TITLE 20 – DEPARTMENT OF COMMERCE AND INSURANCE**  
**Division 4240 – Public Service Commission**  
**Chapter 23 – Electric Utility Operational Standards**

**ORDER OF RULEMAKING**

By the authority vested in the Public Service Commission under sections 386.250 and 393.140, RSMo 2016, the Commission adopts a rule as follows:

20 CSR 4240-23.040 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on February 17, 2026 (51 MoReg No. 4, 312-314). The sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

**SUMMARY OF COMMENTS:** The public comment period ended March 25, 2026, and the commission held a public hearing on the proposed rule on April 3, 2026. The record for the public hearing was held open until April 7, 2026 to receive additional responsive comments. The commission received timely written comments from five (5) people representing five (5) entities during the comment period and five (5) people representing five (5) entities provided comments at the hearing. The comments were generally in support of the proposed rule with several suggested changes.

**COMMENT #1:** Scott Stacey, Deputy Counsel of Staff Counsel’s Office, on behalf of the Missouri Public Service Commission Staff (staff) commented in support of the rule. Mr. Stacey referred to staff’s written comments which included responses on March 24, 2026, and April 2, 2026. Present with Mr. Stacey was Claire Eubanks and Trevor Rucker of staff. Mr. Stacey commented that staff was in support of the proposed rule and were either opposed or not opposed to various comments of commentors as stated in staff’s filed responses. Staff’s April 2, 2026 filing also included recommended changes to the proposed rule and SRM Reporting Template for clarification and grammatical consistency that were not in response to filed comments by other parties. Staff specifically recommended following revisions: 1) Add a definition for “generation resources” because this term is used in the definition for “capacity resources;” 2) Change the term “planned resource” to “planned capacity resource” for clarity; 3) Update the revision date for the SRM Reporting Template in section (2); 4) Minor wording changes for consistency; and 5) Adjust subsection numbers in section (1) to align with added and removed definitions.

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*By Administrative Rules at 12:47 pm, Jun 29, 2026*

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*By JCAR at 4:05 pm, May 28, 2026*

Staff's responsive positions will be addressed under each commentor's comments listed below.

**RESPONSE AND EXPLANATION OF CHANGE:** The commission agrees with Mr. Stacey's comments and will accept some of the changes suggested by the Office of the Public Counsel (OPC), Union Electric Company, d/b/a Ameren Missouri, Evergy Missouri Metro, Inc. and Evergy Missouri West, Inc. (together referred to as "Evergy"), and Renew Missouri Advocates (Renew) as indicated below. The commission also agrees with staff's recommended clarifications and grammatical consistency revisions. Thus, the commission will modify the rule language in subsections (1)(J) and (1)(K) as published to rewrite from the plural to the singular; subsection (3)(D) changing filing the documents to submitting documents to be consistent with other parts of the rule and other commission rules; and the SRM Reporting Template for clarification and grammatical consistency. The commission will also add a definition in new subsection (1)(R) for "generation resources;" add the word "capacity" to subsection (1)(V) as published; add the word "wholly" for clarity to subsection ((1)(H) as published; and renumber the remaining subsections as needed.

**COMMENT #2 (OPC SUMMARY):** Lindsay VanGerpen, Senior Counsel, on behalf of OPC, submitted written comments and provided comments at the hearing. During the hearing, OPC indicated it had seven (7) proposed written modifications to the proposed rule and orally opposed staff's proposed change to the definition of transmission losses. The OPC's seven (7) suggested modifications to the proposed rule include: 1. Add the word "appropriate" in the definition of "accredited capacity" in 20 CSR 4240-23.040(1)(A) to match the defined term from section 393.1080.4(1), RSMo, and 20 CSR 4240-23.040(1)(C); 2. Strike definitions in 20 CSR 4240-23.040(1)(E), (N), (R), (BB), (DD), and (JJ) because they are not used in either the proposed rule or in the updated SRM Reporting Template; 3. Modify the reference to energy storage resource in the definition of "capacity resource" to match the defined term in 20 CSR 4240-23.040(1)(H); 4. Clarify or strike the definition of "demand-side resources" in 20 CSR 4240- 23.040(1)(J); 5. Modify the defined term in 20 CSR 4240-23.040(1)(M) from "distribution system losses" to "distribution losses" to match the term used in the SRM Reporting Template; 6. Modify the definition of "sufficient capacity" to refer to the defined term "planning reserve margin required capacity" in 20 CSR 4240-23.040(1)(FF); and 7. Modify the term "winter season" at 20 CSR 4240-23.040(1)(KK) to match the term used in subsection (3)(B) of the proposed rule.

**RESPONSE AND EXPLANATION OF CHANGE:** The commission thanks OPC for its comments and participation in the hearing. With modifications, the commission will

accept some of OPC's suggested rule changes that were presented in its written comments and at the hearing. OPC's comments will be addressed more fully below.

COMMENT #2A: OPC proposed adding the word "appropriate" in the definition of "accredited capacity" in 20 CSR 4240-23.040(1)(A) to match the defined term from section 393.1080.4(1), RSMo, and 20 CSR 4240-23.040(1)(C). Staff commented that it agreed with OPC's suggestion of adding the word "appropriate."

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with OPC and staff's comments and will modify the language in (1)(A) as suggested. As a result, the commission will also add the word "appropriate" in subsections (1)(U), (1)(FF), and (1)(HH) as published for consistency.

COMMENT #2B: OPC proposed striking definitions not used in either the proposed rule or in the updated SRM Reporting Template (20 CSR 4240-23.040(1)(E), (N), (R), (BB), (DD), and (JJ)). The terms proposed by OPC include: battery energy storage system (BESS); effective load carrying capability (ELCC); installed capacity (ICAP); pumped storage hydroelectric system; seasonal accredited capacity (SAC); and unforced capacity (UCAP).

Staff commented that the terms ELCC, ICAP, SAC, and UCAP are included as dropdown options for accreditation methodologies in the SRM Reporting Template. Thus, those definitions should remain in the proposed rule. The term "pumped storage hydroelectric system" is included in the definition of "resource type" and should also be kept in the proposed rule. Staff agreed that the term "battery energy storage system (BESS)" may be removed.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with OPC and staff's comments that the definition of BESS in subsection (1)(E) should be deleted and the remaining subsections renumbered. The commission agrees with staff that the terms ELCC, ICAP, SAC, UCAP, and pumped storage hydroelectric system should remain in the proposed rule.

COMMENT #2C: OPC proposed modifying the reference to energy storage resource in the definition of "capacity resource" to match the defined term (20 CSR 4240-23.040(1)(H)).

Staff commented that it agrees that the term should be revised for consistency. Staff is recommending changing the term "energy storage system" to "energy storage system (ESS) resource" and using that term in the definition of "capacity resource."

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with staff that the term “energy storage resource” should be changed to “energy storage system (ESS) resource.” The commission will modify subsection (1)(H) and (1)(P) as published, accordingly.

COMMENT #2D: OPC proposed clarifying or striking the definition of “demand-side resources” (20 CSR 4240- 23.040(1)(J)). OPC asserted the proposed definition does not identify what demand-side resources are. The term is only used once in a note in Exhibit 2 of the SRM Reporting Template. Staff commented that it does not oppose adding the wording “that reduce or shift demand” to the definition. However, the wording should be added earlier in the definition rather than at the end. Additionally, the term “demand-side resources” should be kept in the proposed rule. OPC states that there are difficulties with forecasting demand-side resources, but staff’s position is that demand-side resources must be included in reporting to get a full resource adequacy picture.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with staff that the definition should remain in the rule and that “that reduces or shifts demand” should be added to the definition in subsection (1)(J) as published.

COMMENT #2E: OPC proposed modifying the defined term in 20 CSR 4240-23.040(1)(M) from “distribution system losses” to “distribution losses” to match the term used in the SRM Reporting Template. Staff commented that it does not oppose modifying the term to “distribution losses.”

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with OPC and staff that the definition in subsection (1)(M) should be modified to “distribution losses” instead of “distribution system losses.”

COMMENT #2F: OPC proposed adding “required capacity” after “planning reserve margin” so that the defined term “planning reserve margin required capacity” is used instead of the undefined term “planning reserve margin” in the definition for “sufficient capacity” (20 CSR 4240-23.040(1)(FF)). Staff opposed the proposed change because “the term “sufficient capacity” is defined in section 393.1080, RSMo. Staff also commented that a definition for “planning reserve margin” is being recommended in response to other stakeholder comments.

RESPONSE: The commission agrees with staff that the definition should not be revised as “sufficient capacity” is defined in statute. No changes were made as a result of these comments.

COMMENT #2G: OPC proposed modifying the “winter season” defined term to “winter planning season” to match the term used in subsection (3)(B) of the proposed rule (20 CSR 4240-23.040(1)(KK)). Staff commented that it does not oppose the change.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees the “winter season” defined term should be modified to “winter planning season” in subsection (1)(KK) as published.

COMMENT #2H: At the hearing OPC opposed Evergy’s and staff’s proposed change to the definition of transmission losses in subsection (II) as published. OPC stated its concerns were that the changes to the definition included two terms (“real power” and “transmission facilities”) that were undefined and unclear. OPC also submitted an additional written response on April 7, 2026, which reiterated OPC’s concern on the transmission losses definition.

RESPONSE: The commission disagrees with OPC as real power and transmission facilities are standard terms and do not need to be defined. No changes were made as a result of these comments.

COMMENT #3 (SUMMARY): James Lowery, on behalf of Union Electric Company d/b/a Ameren Missouri, submitted written comments and provided comments at the hearing. Present with Mr. Lowery was Andrew Meyer, Senior Director of Energy Management, and Steve Wills, Senior Director of Regulatory Affairs. During the hearing, Ameren Missouri indicated it had seven (7) written comments and had clarifying questions to address at the hearing. Ameren Missouri indicated it generally agreed with staff’s amendments that were submitted on April 2, 2026.

RESPONSE AND EXPLANATION OF CHANGE: The commission thanks Ameren Missouri for its comments and participation in the hearing. With modifications, the commission will accept some of Ameren Missouri’s suggested rule changes that were presented in its written comments and at the hearing. Ameren Missouri’s specific comments will be addressed more fully below.

COMMENT #3A: Ameren Missouri indicated that the definition of “demand-side resources” appears to assume that an explicit capacity (in megawatts) is reported to Midcontinent Independent System Operator (MISO) when information on a utility’s demand-side resources are submitted to MISO. Ameren Missouri wanted to clarify that no such explicit capacity value is reported to MISO, but the company can supply such information to the commission. Staff commented that since Ameren Missouri has stated that it is able to provide the information, staff does not recommend any changes based on this comment.

RESPONSE: The commission thanks Ameren Missouri for its comments and participation in the hearing. The commission agrees that if the information can be provided to the commission, then no changes to the rule are needed. No changes were made as a result of these comments.

COMMENT #3B: Ameren Missouri stated the rule should provide clarity regarding future capacity purchases and how they should be included in the SRM Reporting Template. If additional capacity was needed, Ameren Missouri would first try to procure the capacity bilaterally, which it would report in Exhibit 6 Contracted Resources. If additional capacity was bought in the MISO Planning Resource Auction, Ameren Missouri would report this in row 44 of Exhibit 3 Planning Resources. Staff agreed with Ameren Missouri’s explanation of how it would report the additional capacity in the SRM Reporting Template. Therefore, staff stated that clarification in the rule language is not necessary.

RESPONSE: The commission agrees with staff that no clarification is needed. No changes were made as a result of these comments.

COMMENT #3C: Ameren Missouri stated that in Exhibits 1 and 2 in the SRM Reporting Template it is not clear for which region the forecast peak demand coincident to the RTO/ISO should be provided. Staff responded that once the appropriate RTO/ISO is selected from the dropdown list at the top of each sheet in the SRM Reporting Template, the appropriate region will automatically populate. For MISO, the sheets will show MISO LRZ 5. At the hearing, Ameren Missouri commented that it provides three (3) forecasts to MISO – non-coincident peak demand, zonal coincident peak demand, and coincident peak to the MISO region. Ameren Missouri further commented that the template only sought non-coincident peak demand and zonal peak demand. Also at the hearing, staff indicated that changes to the template may be needed to address Ameren Missouri’s comment.

RESPONSE AND EXPLANATION OF CHANGE: After reviewing the comments, the commission determines that changes should be made to the SRM Reporting Template to

address Ameren Missouri's comments. The commission determines that all three (3) demand forecasts that Ameren Missouri provides to MISO should be included in the SRM Reporting Template. The commission will make the following changes: 1) Add a section to Exhibit 1 Actual Demand for peak demand coincident to RTO/ISO zone (only applicable to MISO), 2) Add lines to Exhibit 2 Forecast Demand for coincident peak demand to RTO/ISO zone (only applicable to MISO), and 3) Update the coincident peak demand to RTO/ISO region fields on Exhibits 1 and 2 so that when MISO is selected, it will now display MISO Region rather than MISO LRZ 5. The commission will make these changes to the SRM Reporting Template and section (2) will be revised to reflect the new publication date for the SRM Reporting Template that is incorporated by reference in that section.

COMMENT #3D: Ameren Missouri proposed adding a line to Exhibit 3 for "Planning Reserve Margin, %." Staff did not oppose adding this information to the SRM Reporting Template and suggested the term "planning reserve margin" will need to be defined and provided a definition in its responsive comments.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with adding a line to Exhibit 3 of the SRM Reporting Template and adding staff's suggested definition of "planning reserve margin" as the new subsection (1)(X). The commission will also renumber the following subsections as needed.

COMMENT #3E: Ameren Missouri proposed removing the commercial operation date (COD) column in Exhibit 5 Owned Resources from the SRM Reporting Template because the resources are already in operation and the COD does not impact the resources' capacity. Also, more rows should be added to accommodate the number of units that Ameren Missouri will need to report (110 rows). Staff stated the COD for resources already in operation provides information for how long the resource has been in operation. Thus, the COD column in Exhibit 5 Owned Resources should remain. However, staff indicated that Exhibit 5 Owned Resources should be expanded to allow all owned resources to be included.

RESPONSE AND EXPLANATION OF CHANGE: The commission disagrees with removing the COD column, but Exhibit 5 Owned Resources will be expanded on the SRM Reporting Template incorporated by reference in section (2) to allow all owned resources to be included.

COMMENT #3F: Ameren Missouri proposed adding a definition for "contracted capacity resources" in section (1). Ameren Missouri further stated the term "contracted resources"

should be defined. Renew stated it supports the comments by Ameren Missouri regarding the need for a definition for “contracted resources”. Staff agreed with Ameren Missouri and Renew that the term “contracted resources” and also the term “company owned capacity resources” should be defined. Staff presented suggested definitions which the parties present at the hearing did not oppose.

Ameren Missouri also commented that the dropdowns in Exhibit 6 of the SRM Reporting Template should be corrected. Ameren stated when it contracts for capacity, it will not always know the location of the resource so columns (d)-(h) in Exhibit 6 Contracted Resources should have a dropdown option of “unknown” rather than just “Y” or “N.” The “Maximum Operating Capacity Contracted” columns should also allow a response of “unknown” because Ameren Missouri contracts for the accredited capacity and, therefore, the maximum capability of the resource does not matter. Also, some dropdowns appear to be inoperable.

In response to other stakeholder comments, staff recommended adding a line to Exhibit 3 Planning Resources for system capacity purchases for contracted capacity that is not tied to a specific unit or resource. Staff explained this change may address Ameren Missouri’s comment regarding not knowing the location of a contracted resource. Regarding an unknown maximum operating capacity for a contracted resource, staff indicated those cells do not contain dropdown lists, so it would be acceptable to put “unknown” if an electrical corporation does not have that information. Further, staff stated that the dropdowns on Exhibit 6 of the SRM Reporting Template that did not have any options to select should be corrected.

During the hearing, Ameren Missouri commented that clarification was still needed regarding contracted resources that Ameren Missouri does not have information regarding the specific resource or unit. Staff responded at the hearing that capacity not tied to specific resources should be included in the system capacity resources added to Exhibit 3 of the SRM Reporting Template. Ameren Missouri accepted staff’s clarification.

**RESPONSE AND EXPLANATION OF CHANGE:** The commission agrees that staff’s suggested definitions should be added to the rule and will make such changes. These definitions will be added as new subsections (1)(I) and (1)(J). The commission will also correct the dropdowns in Exhibit 6 of the SRM Reporting Template incorporated by reference in section (2).

COMMENT #4 (SUMMARY): James Fischer, on behalf of Evergy, submitted written comments and provided comments at the hearing. During the hearing, Evergy indicated it had six (6) proposed modifications to the proposed rule. Evergy indicated it agreed with staff's amendments and/or responsive comments that were submitted on April 2, 2026.

RESPONSE: The commission thanks Evergy for its comments and participation in the hearing. The commission has considered Evergy's comments and the responses to those of staff and will make some modifications as a result as set out fully below.

COMMENT #4A: Evergy proposed removing the definition of "demand-side resources" in subsection (1)(J) as published because the term is not used in the proposed rule or SRM Reporting Template. Staff disagreed and stated the term "demand-side resources" is used in a note on Exhibit 2 Forecast Demand of the SRM Reporting Template and the definition should remain.

RESPONSE: The commission disagrees with the removal of the "demand-side resources" definition as the term is used within the SRM Reporting Template. No changes were made as a result of these comments.

COMMENT #4B: Evergy proposed revising the definition of "demand response resources" in subsection (1)(K) to better reflect how Southwest Power Pool (SPP) and MISO approach demand response. Specifically, Evergy recommended adding two sentences to the end of the definition to clarify how demand response is quantified and measured.

Staff did not oppose adding the sentence regarding quantification as suggested by Evergy. However, staff opposed adding the second sentence attempting to define how demand response is measured. Staff's position is that this is unnecessary for the definition of "demand response resources." Staff stated that the requirements for measurement of demand response resources considered in resource adequacy determinations are set by the appropriate RTO/ISO, and can be different between RTO/ISOs, so the definition should remain flexible to accommodate any differences.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with adding the first sentence proposed by Evergy and agrees with Staff that no other changes to the definition are warranted. Therefore, the commission will amend the definition of "demand response resource" in subsection (1)(K) as published.

COMMENT #4C: Evergy proposed revising the definition of “transmission losses” in subsection (1)(II) as published to better align with the calculation of actual transmission losses. Staff responded that electrical corporations may get values for transmission losses differently for the purposes of resource adequacy, so the definition of “transmission losses” in the proposed rule was meant to be flexible to allow for these differences. If other electrical corporations do not object to Evergy’s proposed revisions, staff does not oppose the revisions. No other electrical corporations opposed the revisions suggested. OPC opposed the revisions suggested, as discussed above.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with Evergy and Staff and will modify the definition of transmission losses in subsection ((1)(II) as published to read: “Transmission losses means the amount of real power, expressed as a percentage, that is lost in transmission facilities, when delivering energy to load.”

COMMENT #4D: Evergy proposed revising subsections (3)(B) and (3)(C) to remove exact dates by which electrical corporations in SPP shall submit an SRM Reporting Template to allow flexibility for anticipated changes in SPP related to submission dates and any future changes SPP makes to planning seasons or submission deadlines. Staff’s responded that specific dates by which SRM Reporting Templates shall be submitted should be kept in the rule. Staff stated the dates in the rule can be updated in future rulemakings if an RTO/ISO changes submission dates.

RESPONSE: The commission agrees with staff that the specific dates by which SRM Reporting Templates shall be submitted should remain in the rule. No changes were made as a result of this comment.

COMMENT #4E: Evergy proposed combining purchases and sales on Exhibits 5 and 6 of the SRM Reporting Template into one sheet and including on that sheet a place for reporting system capacity sales that are not from a specific unit or resource. Staff opposed that recommendation. Staff stated it recognized that system capacity sales do not clearly belong in Exhibits 5 or 6. Staff suggested adding a line to Exhibit 3 for system capacity sales. Staff also stated that as a result, a definition for “system capacity sales” should be added to the proposed rule, as well as a definition for “system capacity purchases.” Staff further recommended adding lines to Exhibit 3 for planned system capacity sales, system capacity purchases, and planned system capacity purchases. The parties present at the hearing did not oppose the suggested definitions.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with staff that lines should be added to Exhibit 3 of the SRM Reporting Template for system capacity sales, system capacity purchases, planned system capacity sales, and planned system capacity purchases. The commission also agrees with the addition of the definitions of “system capacity sales” and “system capacity purchases” given by staff in its responsive comments. The commission disagrees with Evergy that there should be a combined sheet for purchases and sales. Thus, the commission will add those definitions as new subsections (2)(JJ) and (2)(KK).

COMMENT #4F: Evergy proposed that the accreditation methodology columns should be removed from Exhibit 7 Planned Resources in the SRM Reporting Template. Staff responded that Evergy did not include reasoning for why the accreditation methodology should be removed from Exhibit 7 and stated it is beneficial to know the accreditation methodology that electrical corporations are using to estimate the accredited capacity of planned resources so that staff can evaluate if the estimated accredited capacities are reasonable.

RESPONSE: The commission agrees with staff that this information is beneficial and no changes were made as a result of this comment.

COMMENT #5: Nicole Mers, General Counsel, on behalf of Renew, submitted written comments and provided comments at the hearing. During the hearing, Renew indicated it had two (2) proposed modifications or comments to the proposed rule one of which has been addressed above. Additionally, Renew commented that the information reported pursuant to this rule, with appropriate treatment of confidential information, should be filed in a manner that is accessible to all appropriate stakeholders, similar to current reporting requirements for capital investment plans, renewable energy standard compliance, and other similar annual reporting. Alternatively, the information reported pursuant to this rule should be transmitted, with appropriate safeguards for confidential information, as part of the integrated resource planning (IRP) process, to appropriate stakeholders. Renew suggested that this can be accomplished by including the information in the minimum filing requirements of the future, new IRP rules.

Staff commented that submission of the SRM Reporting Template under the proposed SRM rule should be separate from filings under the future IRP rules. Staff stated it intends that submissions of the SRM Reporting Template will be non-case submissions in the commission’s electronic filing and information system (EFIS), rather than in a case docket. The general public is able to view non-case submissions in EFIS, except for confidential

and highly confidential attachments. The designation of confidential information is covered by 20 CSR 4240-2.135.

RESPONSE: The commission thanks Renew for its comments and participation in the hearing. The commission agrees with staff and no changes were made as a result of these comments.

### **20 CSR 4240-23.040 State Reliability Mechanism (SRM)**

(1) Definitions. The following definitions shall apply in this rule:

(A) Accredited capacity means the deliverable or firm capacity value as determined and assigned to a resource by the appropriate regional transmission organization or independent system operator (RTO/ISO) for determining resource adequacy;

(E) Behind the meter generation (BTMG) means a generation resource located downstream of an electrical corporation's interconnection point to an RTO/ISO's system, such as a substation, but only one that is considered by the appropriate RTO/ISO in resource adequacy determinations;

(F) Bilateral contract means an agreement for the rights to future capacity;

(G) Capacity resource means a generation resource, demand response resource, or ESS resource wholly owned, partially owned, or contracted by an electrical corporation for providing resource adequacy;

(H) Coincident peak demand means the demand experienced by an electrical corporation at the time that the appropriate RTO/ISO experiences peak demand during the applicable time period;

(I) Company owned capacity resource means a capacity resource for which an electrical corporation has an ownership stake for a portion or all of the accredited capacity;

(J) Contracted capacity resource means a capacity resource for which an electrical corporation has an agreement for a portion or all of the accredited capacity;

(K) Demand-side resource means a resource or program that reduces or shifts demand that is included in resource adequacy determinations submitted to the appropriate RTO/ISO and may be considered a capacity resource in accordance with the rules of the appropriate RTO/ISO or may be included in an electrical corporation's peak forecast but not both;

(L) Demand response resource means a resource that is considered by the appropriate RTO/ISO in resource adequacy determinations that can be dispatched by the appropriate RTO/ISO or electrical corporation to reduce or shift demand. Demand response is the quantified impact reduction of electricity consumption, across one or more customer sites deployed in response to system reliability needs or an economic price signal;

(M) Distribution losses means the amount of real power that is lost across an electrical corporation's system that is included in the electrical corporation's forecast peak demand;

(P) Energy storage system (ESS) resource means a resource capable of capturing energy, storing it, and dispatching the energy back into the bulk power system or the utility's distribution system, and accredited by the appropriate RTO/ISO in resource adequacy determinations;

(R) Generation resource means a resource capable of producing electricity and dispatching the electricity into the bulk power system or the utility's distribution system, and accredited by the appropriate RTO/ISO in resource adequacy determinations;

(S) Installed capacity (ICAP) means an accreditation method by which a capacity value is assigned to a generation resource based on the demonstrated output of the generation resource or the contracted output of the generation resource;

(T) Load diversity factor means the ratio of an electrical corporation's coincident peak demand to the actual peak demand of the service territory and shall be determined by dividing the coincident peak demand by the non-coincident peak demand;

(U) Maximum operating capacity means the current maximum intended output of a generator as designed by the manufacturer (e.g., nameplate), as modified after initial installation, as determined based on annual testing required by an appropriate RTO/ISO, or as limited by licensing, permitting, or other operating restrictions;

(V) Non-coincident peak demand means the maximum peak demand experienced by an electrical corporation during the applicable time period, regardless of the demand experienced by the appropriate RTO/ISO;

(W) Planned capacity resource means a capacity resource that has not yet been placed into operation or for which an electrical corporation has not yet purchased or contracted;

(X) Planning reserve margin (PRM) means the percentage, set by the appropriate RTO/ISO, above the forecasted coincident peak demand for which an electrical corporation must have adequate capacity resources to meet. For electrical corporations that take part in the SPP resource adequacy process, the PRM is the base PRM;

(Y) Planning reserve margin required capacity means the capacity determined by the appropriate RTO/ISO for which an electrical corporation must have equal to or greater than accredited capacity for the applicable time period;

(Z) Planning season, for electrical corporations that take part in the MISO resource adequacy process, means the seasons (summer, fall, winter, spring) in a planning year;

(AA) Planning year (PY) means from June 1 of one year through May 31 of the following year that is used for the SRM Reporting Template as described in section (2) of this rule;

(BB) Power purchase agreement (PPA) means an electricity supply agreement between a power producer and an electrical corporation;

(CC) Public Utility Regulatory Policies Act of 1978 (PURPA) qualifying facility (QF) means a cogeneration facility or a small power production facility that meets the requirements of 18 CFR 292.201 through 292.211 and has obtained a QF certification in accordance with 18 CFR 292.207;

(DD) Pumped-storage hydroelectric system means an ESS where water is pumped to a reservoir at a higher elevation during times of lesser demand, and then the water is released to a reservoir at a lower elevation with the water passing through turbines to generate electricity at times of increased demand;

(EE) Resource type means the fuel or source from which a capacity resource obtains energy, including but not limited to natural gas, coal, oil, solar, wind, nuclear, hydroelectric, geothermal, and pumped-storage hydroelectric system;

(FF) Seasonal accredited capacity (SAC) means an accreditation method by which a capacity value is assigned to a capacity resource based on the availability of the capacity resource during times of increased demand during the relevant season;

(GG) Service territory means the area in which the electrical corporation has been approved by the commission to provide electrical service to customers;

(HH) Sufficient capacity means owned or contracted-for capacity that meets the planning reserve margin or successor metric established by the appropriate RTO/ISO or established by the commission if the electrical corporation is not a participant in a regional transmission organization or independent system operator;

(II) Summer planning season, for electrical corporations that take part in the SPP resource adequacy process, means June 1 through September 30 each year;

(JJ) System capacity purchases means purchases for a specific amount of accredited capacity not tied to specific generation resources;

(KK) System capacity sales means sales for a specific amount of accredited capacity not tied to specific generation resources;

(LL) Transmission limitations means known and measurable constraints within the appropriate RTO/ISO's system that limit the amount of power that can be delivered from an electrical corporation's capacity resources to the electrical corporation's system;

(MM) Transmission losses means the amount of real power, expressed as a percentage, that is lost in transmission facilities, when delivering energy to load;

(NN) Unforced capacity (UCAP) means an accreditation method by which a capacity value is assigned to a generation resource after adjusting the ICAP for the expected availability or historical availability of the generation resource or fuel availability; and

(OO) Winter planning season, for electrical corporations that take part in the SPP resource adequacy process, means December 1 through March 31 each year.

(2) Reporting form. The SRM Reporting Template shall include the electrical corporation's plan to own or have rights to sufficient capacity to meet its capacity obligations for the

upcoming planning year and each of the three (3) subsequent years. The SRM Reporting Template, revised April 17, 2026, is hereby incorporated by reference and made a part of this rule. The SRM Reporting Template is available at [www.psc.mo.gov/](http://www.psc.mo.gov/). This rule does not incorporate any subsequent amendments or additions.

(3) Reporting.

(D) An electrical corporation shall submit supplemental SRM Reporting Templates if inaccurate information or mistakes are identified in the electrical corporation's initial submission or previous supplemental submissions of any of the above within fourteen (14) days of the discovery by the electrical corporation of the inaccurate information or mistakes.