

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In The Matter of a Determination of Special)	
Contemporary Resource Planning Issues to be)	
Addressed by The Empire District Electric)	<u>File No. EO-2018-0048</u>
Company in Its Next Triennial Compliance)	
Filing or Next Annual Update Report)	

**MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT – DIVISION OF
ENERGY’S SUGGESTED SPECIAL CONTEMPORARY RESOURCE PLANNING
ISSUES**

COMES NOW the Missouri Department of Economic Development – Division of Energy (“DE”)¹ pursuant to 4 CSR 240-22.080(4) and, in response to the Missouri Public Service Commission’s (“Commission”) August 14, 2017 *Order Opening a File Regarding Special Contemporary Resource Planning Issues and Offering an Opportunity to File Suggestions* in the above-captioned matter, suggests the following special contemporary resource planning issues:

1. Identify and evaluate the quantifiable non-energy benefits (“NEBs”) which could be included in the utility’s demand-side management (“DSM”) portfolio planning process for the purposes of IRP planning under the Commission’s recently revised Missouri Energy Efficiency Investment Act (“MEEIA”) rules. Additionally, evaluate the impact of a NEBs percentage “add” on the utility’s demand-side management portfolio planning process for the purposes of IRP planning. Discuss the utility’s preference for either a study to determine NEBs or the use of a NEBs percentage adder.

¹ On August 29, 2013, Executive Order 13-03 transferred, “... all authority, powers, duties, functions, records, personnel, property, contracts, budgets, matters pending, and other pertinent vestiges of the Division of Energy from the Missouri Department of Natural Resources to the Missouri Department of Economic Development”

2. Evaluate, describe, and document the feasibility, cost-reduction potential, and potential benefits of joint DSM programs, marketing, and outreach with water utilities.

3. Describe and document the benefits and detriments for integrated resource planning to requiring achievement of targets under MEEIA.

4. Describe, document, and evaluate potential DSM programs which could address the needs of customers that might otherwise “opt out” of participation in MEEIA. In this evaluation, describe and document potential participation and savings (both energy and demand), as well as program costs and cost-effectiveness. Additionally, please describe and document the impacts of additional customer “opt-outs” on the MEEIA charges to customer classes and the ability to achieve estimated savings targets.

5. Evaluate the potential demand and energy load associated with electric vehicles within the utility’s Missouri service territory, discuss how the preferred plan addresses the additional demand and energy load requirements, and evaluate potential means for shifting the additional demand and energy load to off-peak periods. Describe all current and planned electric vehicle initiatives undertaken by the utility.

6. Describe and document the roles which energy storage and conservation voltage reduction could play in the utility’s system planning, particularly with regards to DSM and distributed energy resources.

7. Evaluate the need to upgrade and enhance the utility’s delivery infrastructure in order to ensure and advance system resiliency, reliability, and sustainability. In this evaluation, describe and document the potential job growth that utility investments in delivery infrastructure could create.

8. Separately describe and document how the utility's investments in grid modernization, DSM (as evaluated in the current or most recent IRP) and renewable energy will ensure that the public interest is adequately served and that other policy objectives of the state are met (see 4 CSR 240-22.010). For example, please describe and document the potential for job creation and economic development.

9. Describe and document the utility's coordination with the State Emergency Management Agency to ensure readiness for physical and cyber security threats.

10. Describe and document the utility's efforts to address the corporate social responsibility and/or renewable energy purchasing goals of commercial, industrial, institutional, and public sector customers for increased access to renewable energy and distributed generation resources.

11. Describe and document how the utility's standby rates, cogeneration tariffs, and interconnection standards facilitate the development of customer-owned distributed generation resources and microgrids.

12. Describe and document the extent to which federal investment, production, and other tax credits reduce the costs for utility plant.

Communications, correspondence, orders and decisions in this matter should be addressed to the undersigned.

Respectfully submitted,

/s/ Brian Bear

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been emailed to the certified service list this 14th day of September, 2017.

/s/ Brian Bear

Brian Bear