BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Proposed Rules for Chapter 21 of 20 CSR 4240 Relating to Resource Planning for Electric Utilities	)))	**Case No. EX-2027-0085**

NOTICE OF COMMENTS AND CHANGES MADE IN THE WORKSHOP CASE DURING THE DEVELOPMENT OF NEW IRP RULES FOR ELECTRIC UTILITIES

Issue Date: October 29, 2026

The integrated resource planning (IRP) rules for electrical corporations, which are the subject of this rulemaking case, were developed with stakeholder input in a Commission workshop case, Case No. EW-2026-0091.[1]

The Commission is providing the attached comment response table to inform interested persons and entities of the Commission's responses to stakeholder comments on the last version of the proposed rules in the workshop case. These responses inform the changes made in the Initial SOS filing version of the IRP rules filed in the rulemaking case. The attached table is merely informational.

In this rulemaking case the Commission will address only address comments made during the comment period, which runs from November 2, 2026 through December 2, 2026, or at the December 15, 2026, public hearing.

BY THE COMMISSION

Nancy Dippell

Nancy Dippell
Secretary

[1] Case 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*.

John T. Clark, Senior Regulatory Law Judge,
by delegation of authority pursuant to
Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 29th day of October, 2026.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

Note: The "Section" column refers to the section from the previous version of the draft rules, which may have changed in the current version.

Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
1	OPC	010	21.010(2)(C)	The commission shall review an electric utility's integrated resource plan to determine if it appropriately ~~addresses~~ balances all of the balancing factors	Section 393.1900.4 of the Revised Statutes of Missouri requires the Commission to determine whether the integrated resource plan ("IRP") "appropriately balances all of the following factors." To ensure consistency between the rule and the statute, the OPC suggests that the language of the rule match the language of the statute.	Incorporated where requested	
2	New Energy Economics	010	21.010	The purposes of this chapter should include: 1. Guidelines for a model RFP and competitive procurement, identifying resource needs in technology-neutral terms, evaluating resources and portfolios capable of meeting those needs on a comparable basis, reducing customer exposure to unreasonable cost and fuel-price risk, and testing material implementation-period resource needs through competitive all-source procurement, unless the Commission finds, based on record evidence, that such procurement is not practicable or not in the public interest. 2. Guidelines for cost-risk reduction, identifying resource needs in technology-neutral terms, evaluating portfolios capable of meeting those needs at the lowest reasonable cost and lowest reasonable customer risk, and reducing customer exposure to unreasonable fuel-cost risk, market-purchase risk, capital-cost risk, large-load risk, stranded-cost risk, and other implementation-period risks. In determining whether a preferred resource plan appropriately balances the factors in this rule and Section 393.1900, RSMo, the Commission shall consider whether the utility has demonstrated that the plan is the lowest reasonable cost and lowest reasonable risk portfolio capable of meeting identified resource needs.	Commission's proposed rule recognizes important statutory balancing factors, including resource adequacy, reliability, rate impacts, third-party generation, overall cost-effectiveness, commodity price risk, supply diversity, competitive pricing, RTO participation, and environmental compliance. NEE supports this framing. However, the general provisions should also clearly state additional purposes of the IRP process are to: · identify resource needs in technology-neutral terms and test material resource needs through competitive procurement; and · reduce customer exposure to avoidable cost risk.	Not incorporated	Under Rule 21.065, various types of procurement documents are listed to be submitted as requirements for supply-side resources that will commence construction during the implementation period. As indicated in Comment Nos. 10, 11, 90, 231, 260, 285, 307, 407, 417, and 418, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included.
3	Ameren Missouri	010	21.010(2)(A)	Strike "(IRP) filings"	Due to clarification of definitions in .015	Incorporated where requested	
4	Ameren Missouri	010	21.010(2)(C)	Insert "the preferred resource plan" and strike "it" so that it reads "…determine if the preferred resource plan appropriately addresses…."	The statute is explicit: the Commission must determine if the PRP balances those factors. The IRP is the entire filing; the entire filing can't possibly balance all those factors but the PRP can (and it must) per the statute.	Incorporated where requested	
5	CGA	010	21.010(2)(C)	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.	Not incorporated	The rule reflects the order of the factors as presented in the statute. They are balancing factors, meaning none is weighted more without justification.
6	CGA	010	21.010(2)(C)4.	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.	Not incorporated	Under Rule 21.065, various types of procurement documents are listed to be submitted as requirements for supply-side resources that will commence construction during the implementation period.
7	Liberty-Empire	010	21.010(2)(C)4.	Clarification to allay concern about a potential requirement that IRP data must come from an RFP or RFI process.	In the proposed General Provisions section, it mentions the consideration of the availability for purchase from third parties of affordable and reliable generation, together with any required transmission. There is no concern with this requirement so long as it does not intend to limit or change the fact that most supply-side candidates are generic in nature and are considered candidates for the purpose of evaluating a diverse set of resource options through a modelling process. We do not agree, for example, that resource cost estimates for IRP evaluation should be required to come from other parties via an RFP or RFI process. Other parties may not offer reliable data inputs simply for planning purposes and there may not be any guarantees that a third party provided cost would still be applicable at the end of the planning process.	Not incorporated	The rules do not require information from a RFP or RFI process to be used in the IRP analysis.

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8	Midwest Energy Efficiency Alliance	010	21.010(2)(C)7.	7. Diversity of supply-side and demand-side resources;	Provide emphasis that IRP is not solely about supply-side resources, and that diversity of both resource types (supply and demand-side) is important to a robust resource plan.	Not incorporated	Section 393.1900.4, RSMo outlines the balancing factors approved by the Missouri Assembly. Demand-side programs is not listed with supply-side program under Section 393.1900.4(7), RSMo. However, 21.060(3)(B)1 requires utilities to "Treat supply-side and demand-side resources on a logically consistent and economically equivalent basis".
9	CGA	010	21.010(2)(C)8.	Describe parameters for item #8 thus: "Competitive pricing, as determined through the use of a request for information, 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".	"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 resources are competitively priced is critical to both ensuring that cost-effectiveness has been appropriately evaluated and providing transparency to stakeholders.	Not incorporated	Under Rule 21.065, various types of procurement documents are listed to be submitted as requirements for supply-side resources that will commence construction during the implementation period.
10	New Energy Economics	015	21.015	Model RFP and Competitive Procurement Guidelines: Add definitions for competitive all-source procurement, model request for proposals or model RFP, market-tested resource cost, independent evaluator, independent administrator, and conforming utility bid. • Competitive all-source procurement means a Commission-reviewed competitive process in which resources and portfolios capable of meeting all or part of a technology-neutral resource need may compete, including utility-owned resources, affiliate resources, third-party generation, power purchase agreements, build-transfer agreements, tolling agreements, demand-side resources, energy efficiency, storage, distributed energy resources, customer-supplied resources, transmission-enabled alternatives, market purchases, bilateral contracts, and hybrid resources. • Model request for proposals or model RFP means the proposed solicitation document, bid forms, eligibility requirements, evaluation criteria, contract forms or term sheets, confidentiality procedures, transmission and interconnection assumptions, and reporting requirements that an electric utility proposes to use to procure resources or portfolios to meet an identified resource need. • Market-tested resource cost means a cost assumption derived from recent competitive solicitations, executed contracts, current bids, independent evaluator or administrator reports, RTO/ISO market data, vendor quotes, or other comparable market evidence, adjusted as necessary to reflect Missouri-specific deliverability, interconnection, tax credit, financing, and timing conditions. • Independent evaluator means an entity independent of the electric utility, its affiliates, and bidders that monitors the solicitation, reviews bid evaluation, evaluates whether utility-owned and third-party proposals are treated comparably, and reports findings to the Commission.	Model RFP and Competitive Procurement Guidelines: Commission's proposed rule adds useful definitions, but it does not yet include several definitions needed for a workable competitive procurement process. NEE recommends adding the following definitions for competitive all-source procurement: · model request for proposals (RFP), · market-tested resource cost, · independent evaluator, · independent administrator, and · conforming utility bid; And the following definitions for cost-risk reduction: · delivered fuel cost, · customer cost-risk exposure, · market-tested cost, · lifecycle economics, and · clean-capacity replacement portfolio.	Not incorporated	As indicated in Comment Nos. 2, 11, 90, 231, 260, 285, 307, 407, 417, and 418, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included.

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11	New Energy Economics	015	21.015	Independent administrator means an entity independent of the electric utility, its affiliates, and bidders that designs, issues, manages, or materially administers a solicitation, receives bids, manages bidder communications, applies or oversees evaluation criteria, and reports to the Commission. • Conforming utility bid means a utility self-build or affiliate proposal submitted in the same format, under the same schedule, and subject to the same information requirements, evaluation criteria, and risk adjustments as third-party bids. Add definitions for delivered fuel cost, customer cost-risk exposure, market-tested cost, lifecycle economics, and clean-capacity replacement portfolio. • Delivered fuel cost means the full cost of fuel delivered to a generating unit, including commodity cost, regional basis, local basis, transportation tariffs, pipeline reservation charges, firm transportation contracts, interruptible transportation assumptions, gas storage charges, balancing charges, fuel-retention charges, backup fuel costs, hedging costs and limitations, gas-electric coordination costs, coal transportation costs, coal supply costs, fuel inventory costs, and costs associated with pipeline constraints or peak-period deliverability. • Customer cost-risk exposure means the extent to which customers may bear higher costs through base rates, fuel adjustment clauses, purchased-power recovery, trackers, riders, deferred accounting, securitization, stranded-cost recovery, large-load cost shifts, or other cost-recovery mechanisms. • Market-tested cost means a cost supported by recent competitive bids, executed contracts, vendor quotes, RTO/ISO market data, independent evaluator reports, or other verifiable market evidence. • Lifecycle economics means the full forward-looking economic evaluation of a resource, including capital costs, fixed and variable operations and maintenance costs, fuel costs, transmission costs, environmental compliance costs, decommissioning costs, remediation costs, outage risk, replacement costs, market revenues or avoided purchases, and customer rate impacts. • Clean-capacity replacement portfolio means a portfolio of resources that may include solar, wind, storage, demand response, energy efficiency, distributed energy resources, DER aggregations, customer-supplied resources, transmission-enabled alternatives, market purchases, bilateral contracts, and flexible-load resources designed to meet capacity, energy, flexibility, and reliability needs while reducing fuel-price and market price exposure.		Not incorporated	As indicated in Comment Nos. 2, 10, 90, 231, 260, 285, 307, 407, 417, and 418, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included.
12	OPC	015	21.015(10)	Balancing factors means the factors, as outlined in 20 CSR 4240-21.010(2)(C), that should be balanced in the development of an ~~alternative~~ integrated resource plan.	Section 393.1900.4 of the Revised Statutes of Missouri requires the Commission to determine whether the IRP "appropriately balances all of the following factors," which match the factors identified in 20 CSR 4240-21.010(2). It is unclear what is meant by referencing only "an alternative resource plan" in the definition of the term "balancing factors," when § 393.1900.4 RSMo. requires the Commission to determine whether the IRP has appropriately balanced these factors. For consistency between the statute and the rule, the OPC suggests this change.	Incorporated where requested	
13	OPC	015	21.015(11)	Base-case load forecast means the forecast generated by using the ~~most probable~~ median values, generally those representing a fifty percentile (50%) probability, for each independent variable contained in a forecast model and based on the electric utility's native forecast adjusted for existing and separately identified existing large load.	This definition is inconsistent in that it refers to both "the most probable values" and "those representing a fifty percentile (50%)." To ensure consistency in the definition, the OPC suggests the change from "most probable" to "median." Alternatively, if the Commission would like to refer to "most probable," the OPC suggests changing the reference to "a fifty percentile (50%)" to something higher.	Partially incorporated (see response for details)	The definition for base-case load forecast has been revised to replace "most probable" with "most likely" and to clarify that the values generally represent the fiftieth percentile of the dataset.
14	OPC	015	21.015(13)	Capacity means the maximum capability, measured in megawatts (MW), to continuously produce and deliver electric power.	The OPC suggests adding a standard unit of measurement to the definition of capacity. This mirrors other definitions that include standard units of measurement, such as avoided demand costs and demand.	Incorporated where requested	
15	Google	015	21.015(15)	Clarify use of 12CP and 4CP.	Across RTOs and ISOs in the US, the definition of coincident peak has/is evolving to better reflect the dynamism experienced in today's energy markets. Google requests that the Commission expand further upon its intended meaning of coincident peak, and specifically share if it is the Commission's intention to use 12CP, 4CP, or another definition of critical peak, and how and whether this coincident peak will align with SPP and MISO definitions for usage	Not incorporated	This definition needs to address several types of coincident peaks (CPs) for a variety of situations. It is not intended that this definition address any multi-hour CP construction, and as such any language that alludes to such constructs is not included. The definition has been edited to improve clarity.
16	OPC	015	21.015(17)	HDD = the maximum of (65 – T) ~~and or zero (0). Cooling degree-days (CDD) are determined by the formula CDD = the maximum of (T – 65) and or zero (0).~~	The equations included in the definition of "Degree-days" for determining heating degree-days ("HDD") or cooling degree-days ("CDD") could be clearer. For clarity, the OPC suggests including parentheses and changing the word "and" to "or." As written, it is unclear what the word maximum is referring to and it is not clear how the 0 affects the equation.	Incorporated with modifications (see response for details)	The definition was changed to address this concern, but conditions were used instead of a maximum statement.

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17	OPC	015	21.015(27)	Econometric methodology means the use of statistical models such as regression models, time series methods, statistically adjusted end use (SAE) models, or hybrid models that integrates end-use determinants with econometric, time-series, or other statistical methods.	The exclusion of "as" appears to be a typographical error. The OPC suggests adding it for readability.	Incorporated where requested	
18	OPC	015	21.015(29)	Electrification means replacing or converting energy-consuming devices, systems, or processes that use non-electric sources of energy with electrically powered equivalents.	The OPC is concerned with this definition as it suggests a desire to phase out natural gas service.	Not incorporated	The definition does not make a judgement on the outcome from electrification, and is necessary to include.
19	OPC	015	21.015(32)	Energy storage system (ESS) means a system capable of capturing energy, storing it, and dispatching the energy back into the bulk power system or the electric utility's distribution system, and accredited by the appropriate RTO/ISO in resource adequacy determinations. ESS may be considered a transmission or generation asset.	The OPC is concerned with this definition as it states that an energy storage system ("ESS") can be considered a transmission asset. It is unclear how an ESS can constitute a transmission asset.	Not incorporated	Energy storage can be used as a transmission asset depending on how it is tied to the system and to the RTO.
20	OPC	015	21.015(34)	End-use measure means an energy-efficiency measure or an energy- management measure.	It is unclear what is meant by "an energy-management measure." Because this term is not defined and is unclear, the OPC suggests striking this aspect of the definition.	Partially incorporated (see response for details)	A definition for energy management measure was added.
21	OPC	015	21.015(72)	Pre-IRP proceeding means the proceeding referenced in § 393.1900.1 RSMo. that is initiated when the electric utility files the pre-IRP minimum filing requirements identified in 20 CSR 4240-21.020(2)(C) and concludes with a commission order specifying the ~~alternative resource plans, scenarios, sensitivities, relevant emerging factors and any other factors items~~ identified in 393.1900.1 RSMo.	The definition as drafted does not reference either the IRP statute, § 393.1900 RSMo., or the rule that identifies the minimum filing requirements for the pre-IRP proceeding. For clarity, the OPC suggests including both. Further, the definition as drafted includes requirements for the Commission's Order that are not referenced in § 393.1900.1 RSMo. For ease of reference and to ensure that the rule complies with the statute, the OPC suggests striking the identified factors and including a reference to the statute.	Partially incorporated (see response for details)	The first statute citation was incorporated; however the rule reference or second statute citation were not. The proposed struck through portion was addressed as part of an Ameren suggestion to clarify what the commission is ordering under Rule 020.(2)(A).
22	Evergy, Inc.	015	21.015(86)	(86) Sensitivity means a model run that changes a ~~single key input to understand how that input affects or drives results across scenarios.~~	A restriction to a single key input is overly narrow. In complex resource modeling, sensitivities may involve correlated inputs that may be varied together to produce meaningful results. Restricting sensitivities to single-input changes may produce misleading results that fail to capture correlations between variables. Evergy recommends striking that limitation.	Not incorporated	Isolating each variable enables the electric utility to better understand each driver, and to analyze the interactions between each one. Otherwise, those relationships may not be discovered, and relevant critical uncertain factors not identified.
23	Evergy, Inc.	015	21.015(95)	(95) Transmission losses means the amount of ~~real power, expressed as a percentage, that is lost in transmission facilities, when delivering energy to to ad.~~	"Real" power is ambiguous, thus Evergy recommends striking. Further clarification is needed on the term's intended meaning.	Not incorporated	Real power is one leg of the power triangle which is commonly used in the electric utility industry to distinguish from apparent and reactive power. Additionally, this definition corresponds to the definition of transmission losses in the new SRM rule, which reflected Evergy's suggested edit to use the term "real power".
24	Ameren Missouri	015	21.015	Per Ameren: Defining "materially changed" injects subjectivity, that is, the electric utility has to guess as to what is "significant" enough to "influence" the commission's judgment, actions. Unworkable. The IRP filing process will have discovery and parties can quite effectively inquire about the source of costs used in the filing, if they are moving, etc., and if the electric utility doesn't think they materially changed and thus doesn't update by 150 days, parties can push back on approval on that basis. There will never be any one definition that can exactly capture this but a subjecting one doesn't work, while an objective one (e.g., a %) would be arbitrary.		Incorporated where requested	
25	Liberty-Empire	015	21.015(12)	A candidate resource should not be defined as a resource that advances to be included in one (1) or more alternative resource plans. A viable candidate that may be considered in the modelling process should not be predicated on it advancing to an alternate plan. By definition, a candidate is something that is considered for inclusion, but it is not guaranteed inclusion. A candidate resource is one that passes initial screening, is a viable resource which the electric utility can reasonably expect to use, develop, implement, or acquire and is passed on to the optimization modelling where it may or may not be selected for a resource plan.	The proposed rule defines candidate resource options to mean the potential demand-side and supply-side resource options that advance to be included in one (1) or more alternative resource plans. There appears to be a problem with this definition. Why does a viable candidate need to be included in a resource plan? It would seem logical that some candidates that pass screening tests could be a resource option used in the modelling but not be selected to be a part of any resource plans. Candidate resource options are selected prior to the optimization modelling taking place, so how can we know if the candidate resource will be included in an alternate resource plan? A good example would be a small modular nuclear unit. It makes sense that they should be studied and be considered a resource option, but it may not be selected for any resource plan for a variety of reasons.	Incorporated where requested	
26	Ameren Missouri	015	21.015(13)	Insert "via supply-side resources or the avoidance of the need for this capability by demand-side resources " so that it reads "...power via supply-side resources..."	Necessary to represent both the load and the supply - def. is not exclusively a supply attribute, it's also a demand attribute; hence use in .030 and .060	Incorporated where requested	

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27	Renew Missouri	015	21.015(13)	Capacity means the maximum capability to continuously produce or store and deliver electric power.	Renew Missouri suggests adding store to clarify that accredited storage projects count for capacity purposes, as SPP and MISO allow.	Not incorporated	Adding storage to this definition does not fit the technology of storage. It would be clearer if there was a need to define both power capacity or power rating. Instead, there is a separate definition for accredited capacity that is technology neutral.
28	Liberty-Empire	015	21.015(17)	Clarification on degree-day base temperature.	The definition uses 65 degrees as a base temperature for a degree-day. Is this just an example or is this definition attempting to state that 65 degrees should be used as the base temperature in all cases?	Incorporated where requested	
29	Midwest Energy Efficiency Alliance	015	21.015(19)	Demand-side program means an organized process for packaging and delivering to a particular market segment a ~~portfolio~~ package of enduse measures that ~~is broad enough to include at least some measures that~~ are a ppropriate for ~~most~~ members of the target market segment. Demand-side portfolio means a group of demand-side programs that include measures appropriate for most members of a target market segment.	The way this is written, it conflates two distinct but related concepts, which we suggest could be broken up into separate definitions. In the demand-side industry, a "portfolio" is generally defined as the larger umbrella unit, made up of the individual programs. A portfolio can also refer to all of the programs targeted at a market segment (i.e., the "residential portfolio"). The broad diversity of serving all members of a market should be seen at the portfolio level. A "program" is the targeted package of end-use measures and does not generally have to be appropriate for most members of a target market – it can be specific to serving a particular target. There should be programs that reach all market members, but each program can be tailored.	Not incorporated	This is the existing rule language in Chapter 22. "Portfolio" itself is not a defined term and is used in the Commission's rules in the ordinary use (e.g. "portfolio of investments" in 20 CSR 4240-20). "Package" can imply the measures are contained in a common box, such as energy efficiency kits some utilities provide to kids at schools.
30	Renew Missouri	015	21.015(20)	Demand-side program means any program conducted by the electric 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 me mbers of the target market segment.	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. 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.	Not incorporated	Retained the proposed definition. "Shift" is not included in the MEEIA statute, which uses "modify the net consumption of electricity." Although terms like "broad" and "some" are general, they are part of the established Chapter 22 framework and allow utilities to develop programs without narrowing the definition in a way that could limit innovation or applicability. The existing Chapter 22 phrasing regarding market segments provides needed flexibility for program design, and the broader language avoids limiting future program development.
31	Ameren Missouri	015	21.015(2)	Insert "or, with respect to the commission's order to be issued in 20 CSR 420-21.020(2)(B)12, a set of conditions used to describe such a schedule (e.g., retirement of an existing resource by a certain date, inclusion or exclusions of certain supply-side, or demand-side resources)." so that it reads "... obligations or, with respect to the commission's order..."	Given the Commission latitude in prescribing the ARPs from the pre-IRP proceeding while drawing a necessary distinction between what an ARP is when used in .060 versus what is happening in the pre-IRP proceeding.	Incorporated where requested	
32	Midwest Energy Efficiency Alliance	015	21.015(2)	"Alternative resource plan means a schedule of a combination of supply-side, demand-side, and distribution and transmission resource additions and retirements developed, or operated by a third-party under a contract including a lease, power purchase agreement, or other service contract, and analyzed by an electric utility as part of its integrated resource plan to meet its load serving obligations."	This language was used in Ohio 2025 HB 15 and provides a broad coverage of other ways that utilities are obtaining resources from third-party providers in the energy marketplace, besides direct development.	Incorporated in a different location (see response for details)	This has been incorporated into the definition of supply-side resources.
33	Midwest Energy Efficiency Alliance	015	21.015(20)	Demand-side resources means resources designed to reduce or shift electricity consumption, particularly during peak demand times, and can include energy efficiency programs and demand response programs.	An important component of DR programs in addition to the ability to shed load is the ability to promote end-users to shift electricity use to lower-cost off-peak hours, though not reducing the total number of kWh consumed. This clarifies that DR resources can have both of these functions.	Not incorporated	"Shift" is not in the MEEIA statute. MEEIA states "...modify the net consumption of electricity on the retail customer's side of the electric meter."
34	Renew Missouri	015	21.015(20)	Demand-side resources means resources designed to reduce or shift electricity consumption, particularly during peak demand times, and can include energy efficiency programs and demand response programs.	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.	Not incorporated	"Shift" is not in the MEEIA statute. MEEIA states "...modify the net consumption of electricity on the retail customer's side of the electric meter."
35	Ameren Missouri	015	21.015(22)	Strike "and document" and strike "the demonstration of compliance with each provision of this chapter" so that is reads "Describe means: the provision of information..." Insert "reasonably" so that it reads "...detail to reasonably inform the stakeholders..." Insert "reasonably allows" and strike "would allow" so that it reads "...in a manner that reasonably allows a stakeholder to..." Insert "applicable" so that it reads "...electric utility's applicable analysis..."	"Describe and document" aren't a demonstration of compliance and they do not always both apply - see specific edits throughout the rule below. An absolute requirement creates a trap for a dissatisfied stakeholder to claim non-compliance - Commission can resolve disputes about what is reasonable	Incorporated with modifications (see response for details)	Created new terms/definitions for describe, document, explain, justify

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36	Ameren Missouri	015	21.015(23)	Strike "the" and insert "an" so that it reads "...information relating to an analysis."	There are many analysis in an IRP	Incorporated with modifications (see response for details)	Split definition of "describe and document" and refined both for clarity.
37	Ameren Missouri	015	21.015(24)	"Descriptive Statistics" – suggest this be updated to "which may include" instead of "including but not limited to". Note that not all critical uncertain factors will be continuous variables that can calculate standard deviations, etc. We understand the key here is to provide the relevant information as possible to help explain the uncertain factor.		Not incorporated	This definition applies to load forecasting and identifies the basic descriptive statistics expected to describe the dataset used in the forecast. The current language allows flexibility where a particular statistic may not be applicable while making clear the minimum information expected.
38	Liberty-Empire	015	21.015(3) and (44)	Instead of explicitly using a 365-day period, it would be more beneficial to use terms like "annual" or a "calendar year".	In multiple definitions (this being the first) it references "annual" data as explicitly meaning a three hundred sixty-five (365)-day time period. However, most planning software contains underlying calendars that are calendar correct with weekdays, weekends, and include leap years. With a planning horizon of at least 16 years, there will be multiple leap years with more than 365 days. Is there a reason for defining annual as an exact 365-day period?	Not incorporated	
39	Ameren Missouri	015	21.015(30)	Strike "End point means a designated juncture within an electric utility planning model or scenario framework that is the result of applying specific potential outcomes associated with each critical uncertain factor."	Not used	Not incorporated	
40	Midwest Energy Efficiency Alliance	015	21.015(4)	~~Appliance~~ Measure saturation means the statistical measurement of the percentage of homes or busines ses that possess a specific type of electric or gas ~~appliance~~ technology (e.g., an appliance, mechanical system or control such as central air conditioning, electric water heater, gas furnace, ~~and a~~ or smart thermostat, etc.) within an electric utility's service territory. ~~Appliance~~ Measure saturation, along with the Unit Energy Consumption (UEC) for each ~~appliance~~ technology, is used as an independent variable in end-use forecasting models.	We would suggest substituting "measure saturation" for "appliance saturation" because it is more accurate to commonly used industry terminology. Referring broadly to multiple technology types as "appliances" is inaccurate and we correct that here.	Incorporated where requested	
41	Liberty-Empire	015	21.015(43)	Clarification about which forecast this definition applies to	This definition states that a historical period means the ten (10) most recent years, or the period of time used as the basis of the electric utility's forecast, whichever is longer. Does this mean the electric utility's load forecast (aka, demand, and energy forecast), as opposed to a fuel forecast for example? It is not completely clear what forecast is being referenced in the definition.	Incorporated where requested	
42	Sierra Club	015	21.015(45)	**Original Text:** Implementation plan means ~~descriptions, costs, and schedules for~~ the supply-side resources or quantity of supply-side resources by supply-side resource type, or both, to be constructed or acquired as part of the preferred resource plan over the i mplementation period and any other information required in accordance with 20 CSR 4240-21.065. **Sierra Club Suggestion for Revised Text:** Implementation plan means **both (1) descriptions, costs, and schedules for** the supply-side resources or quantity of supply-side resources by supply-side resource type, or both, to be constructed or acquired as part of the preferred resource plan over the implementation period and any other information required in accordance with 20 CSR 4240-21.065**; and (2) descriptions, costs, and schedules for demand-side programs and other demand-side resources planned for the implementation period**.	"[D]escription, costs, and schedules" describes the types of materials that must be provided. It should not be stricken. Sierra Club recommends that "descriptions, costs, and schedules" of demand-side measures also be a required part of implementation plans.	Not incorporated	Section 393.1900.4.(17), RSMo delineates the implementation plan as covering the supply-side resources and does not specify demand-side resources.
43	Midwest Energy Efficiency Alliance	015	21.015(45)	Implementation plan means the supply-side and demand-side resources or quantity of ~~supply-side~~ resources by ~~supply-side~~ resource type, or both, to be constructed or acquired as part of the preferred resource plan over the implementation period and any other information required in accordance with 20 CSR 4240-21.065.	The demand-side resources selected should also be included in implementation plans.	Not incorporated	See comment response 42.
44	Ameren Missouri	015	21.015(47)	Strike "submitted as the IRP filing" and insert ".2, .3" so that it reads "...means the document in accordance with section 393.1900.2, .3, which addresses the requirements..."	No need for two definitions describing the same filing; for clarity, reference .2 and .3, which are the statutory sections governing the filing requirements the utility must meet	Incorporated with modifications (see response for details)	The definition was edited to "means the document submitted in accordance with section 393.1900, RSMo, which addresses the requirements outlined in section 393.1900, RSMo and this chapter."
45	Ameren Missouri	015	21.015(48)	Strike "Integrated resource plan (IRP) filing means the IRP submitted to the commission in accordance with section 393.1900, RSMo."	See above comment	Incorporated with modifications (see response for details)	The definition was edited to "Integrated resource plan (IRP) filing date means the date the IRP is required to be filed in accordance with 20 CSR 4240-22.020(1)"

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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46	Ameren Missouri	015	21.015(49)(A)	Insert "schedule of dates upon" and strike "rate at" so it reads "Project realization means the schedule of dates which large load..."	Edits to LL Metrics definition are to track apparent intention – when the projects are realized and how we know that; when loads are realized and when that happens; clarity on when the ramp is; accurate description of load factor and load shape; ; load realization should go after load because it is ex post after the ramp	Incorporated with modifications (see response for details)	Kept the rate language, but added "may be expressed as a percentage" at the end to allow more flexibility in how this concept is expressed.
47	Ameren Missouri	015	21.015(49)(B)	Insert "Permanent service date" and strike "Energization date"; Insert "dates" and strike "schedule for" so that it reads "Permanent service date means the date when large load..."	See above comment	Partially incorporated (see response for details)	Kept Energization date, but changed "schedule for" to "date".
48	Ameren Missouri	015	21.015(49)(C)	Insert "the permanent service date" and strike "energization" so that it reads "...fully ramp from the permanent service date to maximum..."	See above comment	Not incorporated	This suggested change was not included due to the retention of energization date language.
49	Ameren Missouri	015	21.015(49)(D)	Insert "the date permanent service is supplied to the" and strike "initial"; strike "energization" so that it reads "...during the period between the date permanent service is supplied to the project and reaching full forecast peak load."	See above comment	Not incorporated	This was not incorporated in Rule 21.030 as energization is a clearer descriptor.
50	Ameren Missouri	015	21.015(49)(E)	Insert "potential energy used based on continuous energy demand at the customer's" and strike "of" so it reads "...use as a proportion potential energy used based on continuous energy demand at the customer's peak demand."	See above comment	Partially incorporated (see response for details)	Adjusted the definition to address the concern, but did not use the word "potential" in order to avoid confusion with the physical quantity "potential energy". In addition, edited the definition to generally make it more precise.
51	Ameren Missouri	015	21.015(50)	Strike "cost recovery mechanisms"	Has nothing to do with resource planning	Not incorporated	MEEIA is a cost recovery mechanism for DSM and is considered in 21.050 and rate impact is a balancing factor; therefore this suggestion was not incorporated.
52	Renew Missouri	015	21.015(50)	(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 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 actual energy use as a proportion of peak demand. (F) Load shape means providing more detailed energy use information such as a monthly and/or hourly schedule, **(G) 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 expected to be served by the resources.**	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.	Not incorporated	Resource mix is not a metric that describes "whether, when, and to what level large load projects materialize and use electricity over time."
53	Midwest Energy Efficiency Alliance	015	21.015(50)(F)	Load shape means providing more detailed energy use information ~~such as a monthly and/or~~ typically on an hourly schedule.	Hourly ("8760") load shapes are industry standard and should be used in preference to monthly load shapes. This leaves it open enough that if hourly load shapes were not available that a justification could be provided to use a monthly shape.	Partially incorporated (see response for details)	Previously edited this definition, but included language relating to a 8760 hour year.
54	Renew Missouri	015	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]	Not incorporated	Suggestion to add LCOE to 21.060(1)(C)2. was not accepted thus definition is not required.
55	Liberty-Empire	015	21.015(57)	The Southwest Power Pool (SPP) does not use a local clearing requirement (LCR) capacity construct	According to the definition, the local clearing requirement means the minimum amount of capacity needed to ensure reliability within a specific local resource zone or reserve zone. It shall be calculated consistent with the appropriate RTO/ISO requirements. It is our understanding that the Midcontinent Independent System Operator (MISO) uses Local Clearing Requirements (LCR) as a core component of its resource adequacy framework. However, some Missouri utilities (including Liberty) are in SPP and not MISO. SPP does not use a LCR capacity construct.	Incorporated in a different location (see response for details)	In the case of utilities in SPP, since the RTO does not have this requirement it would not be applicable. Changes were made to Rule 21.060 to account for this concern, but no changes are needed to this definition. See also 393.1900.1.(1).
56	Ameren Missouri	015	21.015(59)	Strike "Materially changed means a change in cost, scope, or conditions that is significant enough to reasonably influence the decision or judgment of the commission or alter the commission's evaluation of the plan's prudence or cost effectiveness.	Clarifying when it comes into play - and REF may not support IRP decisions but by specifying them PSC is saying we want them addressed	Incorporated where requested	
57	Ameren Missouri	015	21.015(6)	Strike "(IRP) filing".	Due to clarification of definitions in .015	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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58	Midwest Energy Efficiency Alliance	015	21.015(61)	Maximum achievable potential means energy savings and demand savings relative to an electric utility's baseline energy forecast and baseline demand forecast, respectively, resulting from expected program participation and ideal implementation conditions. Maximum achievable potential establishes a maximum target for demand-side savings that an electric utility can expect to achieve through its demand-side programs and involves incentives that represent a very high portion of total program costs and/or very short customer payback periods. Maximum achievable potential is considered the hypothetical upper-boundary of achievable demand-side savings potential, because it presumes conditions that are ideal and are not typically observed.	Changing this to an "and/or" clarifies that high incentives do not necessarily equate to very short payback periods and vice-versa. For example, a low-cost measure could have a minimal incentive but still provide enough savings for a short payback.	Incorporated where requested	
59	Liberty-Empire	015	21.015(64)	Clarification of net system loads	This definition may be fine, since it states, "the hourly electric supply necessary to meet the energy demands of the electric utility's customers and the electric utility's own internal needs." However, since it mentions netting out the station use, should it also mention the net of other system losses such as line losses, meter losses, etc.? Since you are including one item that is netted out, should it be more inclusive?	Not incorporated	"Net of other system losses" does not need to be explicitly listed because the losses listed are included in "necessary to meet the energy demands".
60	Ameren Missouri	015	21.015(68)	Insert "Participant costs test means a test of the cost-effectiveness of demand-side programs that measures the eco nomics of a demand-side program from the perspective of the customers participating in the program.	See latter comment about PCT, TRC, UCT and DSM	Not incorporated	The terms PCT, TRC, UCT and DSM were not added to Rule 21.050, so the proposed definition is not needed. Also, MEEIA rule applies based on the MEEIA demand-side resources definition.
61	Ameren Missouri	015	21.015(7)	Insert "or the corresponding market-based equivalents of those costs" so that it reads "...distribution or the corresponding..."	Added for consistency with avoided energy cost definition	Incorporated where requested	
62	Liberty-Empire	015	21.015(7) and (8) and (18) and (35)	Clarity on units of measurement.	In multiple definitions, when measuring capacity or demand, the definition explicitly states, "measured in kilowatts (kW)" and for energy it explicitly states, "measured in kilowatt-hours (kWh)." Is the rule attempting to compel the utility to use these units when depicting and labeling data? For example, it is more common to label large units of demand with megawatts and energy with megawatt-hours.	Incorporated where requested	
63	Liberty-Empire	015	21.015(70)	Planning reserve margin may need more clarification	The Planning Reserve Margin (PRM) is the required capacity buffer above forecasted peak demand that Load Responsible Entities (LREs) must maintain to ensure reliability. It is applied to an entity's Net Peak Demand to determine total resource adequacy obligations. The current definition in the proposed rule may be overly simplified based on the current resource adequacy constructs in the various RTO/ISOs. This may be further complicated if different RTO/ISOs have different such constructs. For example, in SPP there is a base PRM and an accredited capacity PRM. The accredited capacity PRM is calculated from the base PRM based on a published formula.	Not incorporated	The definition is consistent with the Commission's proposed SRM rule.
64	Ameren Missouri	015	21.015(72)		See comments above and below about definition of relevant emerging factors	Partially incorporated (see response for details)	The definition was edited to " the proceeding referenced in 393.1900.1, RSMo that is initiated forty-five (45) days prior to when the electric utility files the pre-IRP minimum filing requirements and concludes with a commission order specifying the alternative resource plans, scenarios, sensitivities, relevant emerging factors and any other factors"
65	Midwest Energy Efficiency Alliance	015	21.015(77)	Realistic achievable potential means energy savings and demand savings relative to an electric utility's baseline energy forecast and baseline demand forecast, respectively, resulting from expected program participation and realistic implementation conditions. Realistic achievable potential establishes a realistic target for demand-side savings that an electric utility can expect to achieve through its demand-side programs and involves incentives that represent a moderate portion of total program costs and/or longer customer payback periods when compared to those associated with maximum achievable potential.	As noted above.	Incorporated where requested	
66	Ameren Missouri	015	21.015(78)	Insert "in the pre-IRP proceeding" and "and that should therefore be addressed in the electric utility's IRP" and strike "to support decisions in an electric utility IRP filing" so it reads "...where the commission in the pre-IRP proceeding has determined that additional research and knowledge is needed and that should therefore be addressed in the electric utility's IRP"		Incorporated where requested	
67	Ameren Missouri	015	21.015(79)	Strike "9" and insert "8" so it reads "68"	Why not delete this definition and change where it is used to "planning horizon"?	Incorporated where requested	
68	CGA	015	21.015(83)	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.	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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69	Ameren Missouri	015	21.015(85)	Strike "model run with a specific" so it reads "Scenario means a set of input assumptions and constraints."	This definition is used in the pre-IRP proceeding language and in the load forecasting chapter - as used it is not a model run - this definition works in both places	Incorporated where requested	
70	Renew Missouri	015	21.015(9)	Avoided costs means the cost savings obtained by substituting demand-side programs for existing and new supply-side resources. 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.	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. 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.	Not incorporated	Societal Costs are not part of the Total Resource Cost test. 393.1075 requires that "[t]he commission shall consider the total resource cost test a preferred cost-effectiveness test."
71	CGA	015	21.015(92)	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).	Not incorporated	Upgrading transmission is discussed as a potential supply-side resource, see 21.035(1)(A)7. The definition as written would encompass transmission through the language "any device or method".
72	CGA	015	21.015(93)	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.	Incorporated where requested	
73	Ameren Missouri	015	21.015(95)	Insert "Total resource cost test means a test of the cost-effectiveness of demand-side programs that compares the sum of avoided utility costs plus avoided probable environmental costs to the sum of all incremental costs related to the end-use measures that are implemented due to the program or related to the rates (including both electric utility and participant contributions), plus utility costs to administer, deliver, and evaluate each demand- side program to quantify the net savings obtained by substituting the demand-side program for supply-side resources."	See later comments in DSM chapter - need to define TRC, PCT, and UCT	Not incorporated	Some electric utilities expressed concern in written comments about producing these tests results prior to the avoided cost determination.
74	Sierra Club	015	21.015(95)	**Original Text:** Transmission losses means the amount of real power, expressed as a percentage, that is lost ~~during the~~ in transmission ~~of electricity from generation resources~~ facilities, when delivering energy to ~~an electric utility's interconnection point~~ load. **Sierra Club Suggestion for Revised Text:** Transmission losses means the amount of real power, expressed as a percentage, that is lost ~~during the~~ in the transmission of electricity ~~from generation resources~~ facilities, when delivering energy t o ~~an electric utility's interconnection point~~ load.	Something may have been struck in error here. The text currently reads "lost in transmission facilities.” Sierra Club suggests that the Commission replace this with “lost in the transmission of electricity when delivering energy to load.”	Incorporated where requested	
75	Ameren Missouri	015	21.015(99)	Insert "Utility cost test means a test of the cost effectiveness of demand-side programs that compares the avoided utility costs to the sum of all electric utility incentive payments, plus utility costs to administer, deliver, and evaluate each demand-side program to quantify the net savings obtained by substituting the demand-side program for supply-side resources."	See earlier comment and comment in DSM chapter	Not incorporated	UCT requires avoided cost to calculate which the electric utilities had expressed concern about producing prior to the preferred resource plan selection. Deleted the requirement for the UCT but kept the avoided cost definition.
76	Evergy, Inc.	020	21.020(2)(A)	(A) The pre-IRP proceeding, as outlined in section 393.1900.1., RSMo, shall be conducted to establish alternative resource plans, ~~scenarios, sensitivities, relevant emerging factors, and other operating~~ the factors that an electric utility shall take into account in its IRP filing made pursuant to section (1).	The new requirement to “establish alternative resource plans, scenarios, sensitivities, relevant emerging factors, and other operating factors” is extraordinarily broad compared to the rule’s original language and potentially creates limitless analytical and administrative burden. Evergy recommends striking these new requirements.	Not incorporated	Incorporated a modified version of Ameren's proposed modifications. See comment responses 93-97.
77	OPC	020	21.020(2)(B)	The pre-IRP proceeding shall commence forty-five (45) days prior to filing the pre-IRP minimum filing requirements. To commence the pre-IRP proceeding, the electric utility shall	The rule now requires the pre-IRP proceeding to commence 45 days prior to filing the pre-IRP minimum filing requirements and states what must be requirements. To commence the pre-IRP proceeding, the electric utility shall	Not incorporated	Deleted "no less than" from the start of 17-month time period, therefore there is no need for a 60 day notice.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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78	OPC	020	21.020(2)(B)	*Subsection Generally*	The OPC suggests reorganizing subsection (2)(B). The final sentence of the subsection, which introduces the following list, states that it will introduce requirements that an electric utility must follow to commence the pre-IRP proceeding ("To commence the pre-IRP proceeding, the electric utility shall:"). However, the list includes items that the Commission must do (i.e. (2)(B)3 and (2)(B)12) and items that will occur after the pre-IRP proceeding is commenced (i.e. (2)(B)4 and (2)(B)6). If the Commission desires to maintain the current (2)(B) as drafted, then the OPC suggests that paragraphs 1 and 2 remain nested beneath that subsection and the remaining paragraphs be pulled out. The OPC further suggests that paragraphs 7-9 become nested beneath paragraph 6, as they appear to be requirements that must be completed within the 1 month window referenced in paragraph 6. It may also be helpful to nest paragraph 11 beneath paragraph 10 as it identifies the possible outcomes that stakeholders may reach within the 3 months identified in paragraph 10.	Incorporated where requested	
79	OPC	020	21.020(2)(B)1.	File notice in the docket of the upcoming activities, as outlined in paragraphs (2)(B)~~34. and (2)(B)56.~~; and	As drafted, the paragraph refers to "upcoming activities," but paragraph 3 refers to the commission issuing notice of the case and establishing an intervention deadline, while paragraph 5 refers to the electric utility filing the pre-IRP minimum filing requirements. The OPC believes this should be modified to refer to paragraph 4 (the meeting between the electric utility and stakeholders prior to the filing of the pre-IRP minimum filing requirements) and paragraph 6 (the things that an electric utility must do within 1 month of filing the pre-IRP minimum filing requirements).	Incorporated with modifications (see response for details)	After edits, this is now (2)(B)1.A.
80	Evergy, Inc.	020	21.020(2)(B)12.	No later than eight (8) months after the electric utility files the pre-IRP minimum filing requirements, in accordance with paragraph (2)(A)1., the commission shall issue an order ~~establishing~~ addressing the information outlined in section 393.1900.1, RSMo.	"Establishing" is not appropriate here; because a Commission order cannot create statutory requirements, "addressing" is the more accurate term.	Incorporated with modifications (see response for details)	After edits, this is now paragraph (2)(B)8. and now contains 'address' instead of 'establish'.
81	Evergy, Inc.	020	21.020(2)(B)2.	~~Directly n~~Notify all intervenors in the electric utility's most recent general rate case and most recent IRP c ase of the upcoming activities, as outlined in paragraphs (2)(B)3. and (2)(B)5.	The rule does not define "direct" notice. Constructive notice of filings exists through Electronic Filing and	Incorporated where requested	
82	OPC	020	21.020(2)(B)2.	Directly notify all intervenors in the electric utility's most recent general rate case and most recent IRP case of the upcoming activities, as outlined in paragraphs (2)(B)34. and (2)(B)56.	For the same reasons that the OPC suggested these changes for 20 CSR 4240-21.020(2)(B)1, the OPC suggests these changes for this paragraph.	Incorporated with modifications (see response for details)	After edits, this is now (2.)(B)1.B.
83	Google	020	21.020(2)(B)9.	Clarify number and schedule of meetings and technical workshops.	While Google appreciates The Commission's requirement for utilities to host stakeholder meetings and technical conferences to address issues outlined in the draft rules, Google requests that the Commission be more specific in the number of meetings and technical workshops that will be required.	Not incorporated	The rule is drafted in such a way to allow flexibility for stakeholder schedules and to allow flexibility to tailor the number of meetings to the circumstance.
84	Evergy, Inc.	020	21.020(2)(C)4.	Identification of significant proposed federal and state environmental regulations, laws or rules, and an explanation of how those regulations, laws, or rules apply to the applicable resource type~~, and a description of the expected timeframe when each proposed regulation, law or rule will take effect~~;	Requiring a "description of the expected timeframe" for proposed laws or regulations is extends beyond the requirements of Section 393.1900.2-3 RSMo and assumes a level of certainty about legislative and regulatory process that does not exist. Evergy recommends striking this requirement.	Not incorporated	The requested information in needed in order for stakeholders to assess the timing and the analysis prepared by the electric utility.
85	Evergy, Inc.	020	21.020(2)(C)8.A. and B.	Total estimated costs shall: A. Include capital, fixed and variable operation and maintenance costs, fuel, and any other costs that are relevant for the particular technology; and B. Reflect costs developed or incurred no more than 12 months prior to the pre-IRP minimum requirements filing date;	Evergy recommends revising this requirement to call for estimated costs to permit reasonable flexibility in calculating such costs. Evergy also recommends striking the 12-month cutoff for subsection B. Costs for generation technologies can change significantly within a 12-month period. Given the rule seeks a utility's total costs, it should not unreasonably extend beyond, those statutory factors.	Partially incorporated (see response for details)	Changed the "Total estimated costs" to "Projected total costs".
86	Evergy, Inc.	020	21.020(2)(C)9.	Considerations for developing alternative resource plans, scenarios, sensitivities, and relevant emerging factors, for stakeholder discussion, ~~as required in paragraph (2)(A)3~~ consistent with 393.1900.4 RSMo.	This rule's reference to paragraph (2)(A)(3) is unclear, as that paragraph does not exist. Furthermore, "considerations" is ambiguous, as there could be an enormous number of considerations regarding resource plan, scenarios, sensitivities and relevant emerging factors. 393.1900.4 RSMo outlines factors utilities may consider in developing alternative resource plans. Evergy recommends pre-IRP minimum filing requirements align, and should not unreasonably extend beyond, those statutory factors.	Incorporated with modifications (see response for details)	Deleted the referenced paragraph but did not include the statute reference.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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87	Evergy, Inc.	020	21.020(5)(A)1.	1. File a notification in the IRP docket within ~~thirty~~ ninety (~~30~~) days of the electric utility's determination of such change;	Evergy is concerned that the proposed 30-day period may be insufficient to prepare and file a revised resource plan when a change in plan is required. While Evergy could reasonably provide a notice within 30 days that its approved plan will change, completing all of the substantive requirements set forth in subsection (B) within that same 30-day window is not feasible. Clarification is needed regarding when the utility is deemed to have determined that its plan must change. If the 30-day period begins when the utility first concludes that its plan must change, and the utility then has only 30 days to assess and satisfy all of the requirements in subsection (B), that timeframe will be inadequate; in that circumstance, the period should be extended (for example, to 90 days) to allow sufficient time to meet all filing obligations. However, if the utility is not considered to have determined that its plan must change until after it has completed the analyses required by subsection (B), a 30-day period could be reasonable for providing the required notice.	Partially incorporated (see response for details)	The 30-day period to notify the commission of the change was maintained; however after notifying the parties, the electric utility would have an additional 30 days to file the detailed information outlined in subsection (5)(B). Therefore this increases the timing from 30 days to 60 days.
88	Evergy, Inc.	020	21.020(5)(B)3.	~~3.The impact of the change on the financial performance measures specified in 20 CSR 4240-21.060(1)(C)3.;~~	Evergy recommends striking this requirement in subsection (B)(3) and in 21.060(1)(C)(3). The impact of the change on financial performance measures adds no value, as Evergy already provides rating agency reports, credit rates, and metrics in its CCN filings.	Not incorporated	Since the impacts are not calculated in the current agency reports, pro forma analysis needs to be included.
89	OPC	020	21.020(5)(E)	~~Unless otherwise ordered by t~~The commission~~, shall issue an order~~ within sixty (60) days of the electric utility's filing of the notice required in subsection (5)(B), identifying whether and how the limited inquiry ~~shall be un is~~ affected by the filing of the notice for the specified supply-side resources or specified quantities of supply-side resource types that the electric utility identified as remaining materially consistent with the approved preferred resource plan.	As drafted this subsection suggests that the Commission can make a decision simply by not addressing the filings. This will create ambiguity in the docket as it will not be clear whether the Commission is making such a determination by not addressing the filings, or if they are simply still considering the filings. It also appears at odds with § 393.1900 RSMo., which grants the Commission additional authority to make decisions throughout the IRP process. For consistency with the statute and to increase clarity, the OPC suggests these changes, which would require the Commission to affirmatively state its decision within 60 days.	Not incorporated	The Commission retains discretion under Section 393.1900 RSMo. to address filings as needed, and the existing language is meant to preserve that flexibility rather than create a mandatory decision timeline.
90	New Energy Economics	020	21.020	The pre-IRP proceeding minimum filing requirements shall include an additional section (D) establishing a procurement plan for any material resource need that may result in construction, acquisition, contracting, or cost recovery during the implementation period. The procurement plan shall include: 1. A model request for proposals; 2. A technology-neutral statement of the resource need; 3. Proposed eligible resource types and portfolio options; 4. Proposed bid evaluation criteria and scoring methodology; 5. Proposed contract forms or term sheets; 6. Proposed confidentiality procedures; 7. Proposed treatment of utility self-build and affiliate bids; 8. Proposed transmission and interconnection assumptions; 9. Proposed treatment of demand-side, distributed, customer-side, storage, market, bilateral, and transmission-enabled alternatives; 10. The proposed role of any independent evaluator or independent administrator; and 11. A proposed post-procurement reporting template. The Commission's pre-IRP order shall identify any procurement issues that must be resolved before the electric utility issues a request for proposals or materially relies on procurement assumptions in the IRP filing, including technology-neutral need definition, eligible resource types, bid evaluation criteria, treatment of transmission and interconnection costs, treatment of customer-side and demand-side resources, and treatment of self-build or affiliate bids. The pre-IRP proceeding minimum filing requirements shall include an additional section (E) establishing a customer cost-risk assessment identifying the major cost risks that may affect the alternative resource plans, preferred resource plan, and implementation plan. The assessment should include, at minimum: 1. Delivered natural gas cost risk; 2. Natural gas transportation, reservation, storage, and basis risk; 3. Gas-electric coordination and winter fuel-deliverability risk; 4. Coal fuel, coal transportation, coal supply, and coal inventory risk; 5. Coal environmental-compliance and coal life-extension cost risk; 6. Purchased-power and market-price risk; 7. Large-load materialization, delay, non-materialization, and exit risk; 8. Transmission and interconnection cost risk; 9. Tax-credit availability, delay, or loss; 10. Resource-accreditation and reliability-performance risk; 11. Capital-cost and interest-rate risk; 12. Fuel adjustment clause and other cost-recovery exposure; and 13. Customer bill impacts by rate class. The Commission's pre-IRP order should identify the minimum cost-risk scenarios, sensitivities, and stress cases the utility must evaluate in the IRP filing.	Two additional subsections should be included or current subsections expanded to include pre-IRP minimum filing requirements for a Model RFP and Competitive Procurement process and Cost-Risk Reduction. To ensure the model RFP process receives a robust and viable response, the utility should make the RFP documents and process available at the beginning of the pre-IRP process to allow issues to be clarified and resolved prior to Commission Order concluding the pre-IRP process, during the Contested phase of Pre-IRP process. The pre-IRP process is the best place to review procurement design. If the RFP template, bid evaluation criteria, contract terms, and self-build safeguards are not reviewed until after the IRP is filed, stakeholders and the Commission may have little practical ability to correct biased or incomplete procurement assumptions. NEE recommends that the pre-IRP minimum filing requirements include a proposed procurement plan and model RFP for any material resource need that may result in construction, acquisition, contracting, or cost recovery during the implementation period. Once resolved, the RFP would be issued per instructions provided in and immediately following the Commission Order at the end of the pre-IRP Proceeding Process. However, an 18 month IRP development process is so long that the RFP bids will be stale and will hurt. If developers have low confidence that the bids will be awarded before their market circumstances change, developers may not bid in the first place. Utilities do not have this concern because the utility's resource has already been approved in a plan or CCN and it can commonly recover and earn on changes in project costs that occur after the original cost estimate is provided to the regulator. Therefore, RFP results should be due in time for the bids to inform Production Cost Modeling in the Refined ARPs process, but not so far ahead of bid award that the bidder concludes submitting a bid is not worth the effort. Process could inadvertently prevent least cost resources from being included in the plan. Winning bids, preferably selected by an independent evaluator, consistent with the approved PRP, should file for CCN at same time as planned utility owned resources do in Step 4 of the IRP process. The pre-IRP process is the best point to identify the cost risks that must be tested in the IRP. If fuel-price risk, large-load risk, coal-retention risk, purchased-power risk, and capital-cost risk are not identified early, the utility's preferred plan may be based on incomplete assumptions.	Not incorporated	Given the timeline outlined in section 393.1900, RSMo and other factors, the proposed competitive procurement process during the pre-IRP proceeding appears to be overly prescriptive and were not included. As indicated in Comment Nos. 2, 10, 11, 231, 260, 285, 307, 407, 417, and 418, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
91	Ameren Missouri	020	21.020(1)	n/a	One challenge with a cost estimate is the potential unbounded nature of select requirements, that in our view, go beyond the requirements of the statute. We have not included those costs here but may in the future. Two examples in the pre-IRP process. First, the minimum filing requirements in the pre-IRP still now allow for "any other information the Commission may order" - an addition that does not exist in 393.1900.1. See 020.(2)(B)C(12). Second, 020.(1) requires a defined filing schedule unless "as otherwise ordered by the Commission" – what if the Commission required additional full IRP filings – that would have a real, incremental cost – the statute specified quadrennial filings only. These go beyond the Commission defining a specific scenario or sensitivity to be considered or requiring the Utility to file alongside a pre-determined schedule. While perhaps highly unlikely, it is easy to see how use of these clauses could materially change what it means to develop and file an IRP.	Partially incorporated (see response for details)	The rule language was revised to match statutory language, 393.1900.1.(4)(e), which contemplates any other factors ordered by the commission.
92	Ameren Missouri	020	21.020(1)	Insert "file", strike "make", insert "as required by section 393.1900.2, .3", and strike "filing" so it reads "Each electric utility shall file an integrated resource plan (IRP) as required by section 393.1900.2, .3 every four (4) years, or as otherwise..."	Having two definitions (one of "IRP" and one of "IRP filing" is confusing when applied throughout the rule. 393.1900.1 is the Pre-IRP filing, as it has now been defined. 393.1900.2, .3 require the filing of a quadrennial IRP, i.e., the "IRP". 393.1900.4, .5 prescribe the Commission's role in evaluating and ruling on the IRP. If one simply makes this clear there is no need for two definitions, one of which depends on the other.	Incorporated with modifications (see response for details)	This section was edited to "Each electric utility shall file an integrated resource plan (IRP), as required in section 393.1900, RSMo, every four (4) years, or as needed thereafter otherwise if ordered by the commission, by the first business day in October of the specified year. Each electric utility shall file its initial IRP on the following schedule: ..."
93	Ameren Missouri	020	21.020(2)(A)	Insert "A" and strike "The" so it reads "A pre-IRP proceeding, as outlined in section 393.1900.1., RSMo, shall be conducted to:"	There will be more than one	Incorporated with modifications (see response for details)	This phrase was reworded for clarity.
94	Ameren Missouri	020	21.020(2)(A)1.	Insert ", pursuant to section 393.1900.1(4), a commission-prescribed set of", insert "as well as any commissions-prescribed", insert "and", strike "relevant emerging factors, and other operating factors, strike "take" and insert "analyze in its IRP filing," so it reads " Establish, pursuant to section 393.1900.1(4), a commission-prescribed set of alternative resource plans, as well as any commission-prescribed scenarios, and sensitivities, that an electric utility shall analyze in it's IRP filing,"	Very important reference - makes clear what the Commission is tasked with in the statute 393.1900.1(4) specifies the commission's establishment of a prescribed set of ARPs See comment on definition of "relevant emerging factors" - "other operating factors" is not defined anywhere and can fit within the "relevant emerging factors" definition	Incorporated with modifications (see response for details)	This was edited to "Establish, pursuant to section 393.1900.1(4), any commission prescribed alternative resource plans, scenarios, and sensitivities that the electric utility shall analyze as part of its IRP;"
95	Ameren Missouri	020	21.020(2)(A)2.	Insert " Specify factors that the electric utility may take into account in analyzing the alternative resource plans the commission established under section (2)(A)1; and"	Same subsection of the statute says commission will specify the factors	Partially incorporated (see response for details)	This was edited to "Specify relevant emerging factors that the electric utility shall examine in its IRP."
96	Ameren Missouri	020	21.020(2)(A)3.	Insert "Specify relevant emerging factors that an electric utility shall examine it its IRP filing, strike "into account in its IRP filing made pursuant to section (1),"	Statute doesn't provide for this but it is an appropriate place to provide the commission flexibility to have other areas examined	Incorporated where requested	
97	Ameren Missouri	020	21.020(2)(A)3.	Insert " The alternative resource plans established under this section (2) shall be analyzed in addition to those determined through capacity expansion modeling as required by 20 CSR 4240-21.060 or otherwise established by the electric utility for analysis in its IRP filing. "	To be clear what is happening in the pre-IRP versus in the IRP itself	Incorporated in a different location (see response for details)	This comment was incorporated with modifications made to the current paragraph (2)(B)8.
98	Sierra Club	020	21.020(2)(B)	**Original Text:** ~~The~~ To commence the pre-IRP proceeding, the electric utility shall ~~occur~~:	General Comment: As edited, this section now begins with "...the electric utility shall" but contains items directed to the Commission. Additionally, there appears to be an error in which sub-bullet points come under the main bullet points. Sierra Club recommends rewording or reorganizing this section to clarify which entity (the Commission or utility companies) is responsible for which actions related to the pre-IRP proceeding.	Incorporated where requested	
99	Sierra Club	020	21.020(2)(B)11.B.	**Original Text:** If consensus is not achieved ~~as contemplated in (2)(E)1~~, any party may request a hearing. ~~The~~ for commission ~~shall issue an order no~~ determination on unresolved issues.	General Comment: Sierra Club recommends adding more detailed specifications regarding timing of hearings and criteria for Commission to grant hearings. Since a Certificate of Convenience and Necessity ("CCN") may result from the IRP process, these are consequential proceedings in which rights may be determined. The Commission should therefore specify hearing procedures.	Not incorporated	If there is not consensus amongst the parties, any party may request a hearing and the commission would have to order a hearing in order to inform the commission's final order. Therefore it is not needed to explicitly state that the commission will grant a hearing.
100	CGA	020	21.020(2)(B)11.B.	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.	Not incorporated	See comment response 99.
101	Ameren Missouri	020	21.020(2)(B)12.	Insert "and specifying", insert "items addressed in section (2)(A), and strike "information outlined in section 393.1900.1, RSMo." so it reads "...the commission shall issue an order to establishing and specifying the items addressed in section (2)(A)	To confirm to earlier changes	Partially incorporated (see response for details)	The modification relating to 'specify' was incorporated.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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102	Sierra Club	020	21.020(2)(B)6.	**Original Text:** Within ~~three (3) months~~ one (1) ~~month~~ ~~of~~ ~~the electric utility~~ filing ~~in accordance with subsection (2)(A) of this rut e~~ the pre-IRP minimum filing requirements, the electric utility shall ~~convene~~:	Explanation not provided	Not incorporated	No proposed change provided.
103	Ameren Missouri	020	21.020(2)(C)	Insert " The minimum filing requirements may consist of values and information for the items specified above from the electric utility's most recent IRP filing (and, in the case of the electric utility's first IRP proceeding, its most recent triennial IRP and change in preferred resource plan filing), provided, that to the extent the electric utility, as part of its ongoing resource planning efforts or because of a material condition or event that necessitates a change, has updated such values or information, as applicable, as of the time of its filing of the minimum filing requirements, such updated values or information, as applicable, shall be used."	For the timeline to work and to avoid what would be a serious problem of using stale/inapplicable data when the actual IRP filing analyses are done, the utilities need to be able to lean on the prior IRP for the inputs for pre-IRP proceeding MFRS. We also included the "or because of a material condition or event that necessitates a change" language to acknowledge that some conditions or events would simply require the utility to update values (e.g., a new ESA with a large load customer or loss of a major unit).	Incorporated in a different location (see response for details)	Incorporated with modifications as the new (2)(D) and (2)(E).
104	CGA	020	21.020(2)(C)	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.	Not incorporated	An RFP template is not needed during the pre-IRP phase of the process (see also Comment Nos. 90, 312, and 408). Rule 21.065 includes RFP information to be submitted as part of the implementation plan.
105	Ameren Missouri	020	21.020(2)(C)12.	One challenge with a cost estimate is the potential unbounded nature of select requirements, that in our view, go beyond the requirements of the statute. We have not included those costs here but may in the future. Two examples in the pre-IRP process. First, the minimum filing requirements in the pre-IRP still now allow for "any other information the Commission may order" - an addition that does not exist in 393.1900.1. See 020.(2)(B)C(12). Second, 020.(1) requires a defined filing schedule unless "as otherwise ordered by the Commission" – what if the Commission required additional full IRP filings – that would have a real, incremental cost – the statute specified quadrennial filings only. These go beyond the Commission defining a specific scenario or sensitivity to be considered or requiring the Utility to file alongside a pre-determined schedule. While perhaps highly unlikely, it is easy to see how use of these clauses could materially change what it means to develop and file an IRP.		Partially incorporated (see response for details)	Revised rule language to match statutory language, 393.1900.1 (4)(e), which contemplates any other factors ordered by the commission.
106	Sierra Club	020	21.020(2)(C)12.	**Original Text:** The base-case capacity balance forecast ~~includes~~ shall include the existing supply-side resources through the currently expected life of each asset or contract, expected load growth over th e planning horizon without additions of large load customers, and no resource additions. **Sierra Club Suggestion for Revised Text:** The base-case **summer and winter** capacity balance forecast ~~includes~~ shall include the existing supply-**and demand**-side resources through the currently expected life of each asset or contract, expected load growth over the planning horizon with out additions of large load customers, and no resource additions.	This description of resources that are required to be included in the base-case forecast omits demand-side resources. Demand-side resource levels are a critical part of load forecasting and should be required for inclusion in the base-case forecast. Further, the utilities should be required to provide both summer and winter capacity balance.	Incorporated with modifications (see response for details)	Incorporated with modification, requiring it seasonally as determined by the appropriate RTO/ISO.
107	Sierra Club	020	21.020(2)(C)13.A.	**Original Text:** Existing supply-side resources through the currently expected life of each asset or contract, ~~expected;~~ **Sierra Club Suggestion for Revised Text:** Existing supply-side resources owned/contracted by the large load entity through the currently expected life of each asset or contract, ~~expected~~;	Sierra Club recommends adding "supply-side resources owned/contracted by the large load entity" here for improved clarity.	Not incorporated	Language is in reference to utility's capacity balance sheet with consideration of the impact of large load customers.
108	Evergy, Inc.	020	21.020(2)(C)4.	Identification of significant proposed federal and state environmental regulations, laws, or rules, and an explanation of how those regulations, 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;~~	Evergy reiterates its prior comments that requiring a "description of the expected timeframe" for proposed laws or regulations extends beyond the requirements of Section 393.1900.2-3 RSMo and assumes a level of certainty about legislative and regulatory process that does not exist. In addition, a regulation, rule or law that may take effect five to ten years in the future, for example, falls outside the Implementation Plan period and can be addressed, if necessary, at a later date. Evergy recommends striking this requirement.	Not incorporated	The requested information in needed in order for stakeholders to assess the timing and the analysis prepared by the electric utility.
109	Renew Missouri	020	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, 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;	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.	Incorporated where requested	
110	Sierra Club	020	21.020(2)(C)8.B.	**Original Text:** Reflect costs developed or incurred no more than 12 months prior to the pre-IRP minimum requirements filing date;	An excerpt from the current text was copied without indicating a proposed revision. No further clarification or explanation was provided.	Not incorporated	Proposed change was not provided. Without a request, there was no need to consider modification.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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111	Sierra Club	020	21.020(3)	**Former IRP Rule 020 (3) Original Text:** ~~(3) After a hearing is conducted, the commission shall issue a report and order no later than three hundred sixty days from the date the IRP filing was submitted, unless an extension is granted for good cause by the commission.~~ ~~(A) If the commission determines that the preferred resource plan is a reasonable and prudent means of meeting the electric utility's load serving obligations, such determination shall constitute the commission's permission for the electric utility to construct or acquire the specified supply-side resources, or a specified quantity of supply-side resources by supply-side resource type, or both, identified by the commission, that were reflected in the implementation plan submitted in accordance with 20 CSR 4240-21.065.~~ ~~(B) If the commission determines that the preferred resource plan, in whole or in part, is not a reasonable and prudent means of meeting the electric utility's load serving obligations, the commission shall specify in its report and order the deficiencies in the preferred resource plan and may require the electric utility to make a further filing within sixty (60) days after issuance of the report and order to address the deficiencies. The electric utility shall file a revised IRP addressing the deficiencies and may propose modifications to its original preferred resource plan.~~ ~~1. Any other party to the IRP docket shall have sixty (60) days to respond to the electric utility's updated IRP filing, unless the commission grants an extension for good cause.~~ ~~2. Within sixty days after the deadline for such other parties' filings, the commission shall issue a report and order indicating whether the deficiencies have been cured by the electric utility's revised IRP filing and the commission may approve the electric utility's modified preferred resource plan and may approve specific supply-side resources, or a specified quantity of supply-side resources by supply-side resource type, or both.~~ ~~(C) If the commission finds continued deficiencies in the electric utility's revised preferred resource plan:~~ ~~1. The commission may initiate a complaint proceeding pursuant to the provisions of section 393.270 RSMo; and~~ ~~2. The electric utility shall not be eligible for a limited inquiry in any proceeding under section 393.170 RSMo as set forth in section 393.1900 RSMo.~~	General Comment: This stricken language regarding actions the Commission will take after a hearing is not replaced or otherwise addressed in the updated rulemaking. Sierra Club recommends not to strike. This rulemaking should include clear language describing potential related hearings, how the Commission will determine their need, the structure of the proceedings, and general guardrails regarding their timing. Since a CCN may result from the IRP, these are consequential proceedings, and hearing procedures should be specified.	Not incorporated	The language deleted from the discussion draft was directly from the statute and is not needed in the rule for clarity.
112	Liberty-Empire	020	21.020(3)(C)	According to the proposed rule, the Executive summary is supposed to be suitable for distribution to the public. However, the prescriptive list of requirements may be contradicting this goal.	This part of the proposed rule provides a prescriptive list of components for the IRP Executive Summary. A potential problem with a prescriptive list is that it may make the IRP Executive Summary confidential (such as the request for financial ratios among others). It seems like an Executive Summary should be a public report with limited redactions, if possible.	Incorporated where requested	
113	Evergy, Inc.	020	21.020(3)(C)3.B. and 21.020(3)(C)3.C.(III)(b) and 21.030(8)(B)2.	21.020 (C)(3)(B) The following ~~for each rate class and for the total of all rate classes~~: (I) The base-case load forecasts for peak demand and for energy for the planning horizon, with and without utility demand-side resources, and	Evergy reiterates its original comments that requirements concerning the estimated level of average retail rates by class is outside of the purview of an IRP, is more appropriately	Not incorporated	Referenced language is referring to class level load forecasting not rate impact.
114	OPC	020	21.020(3)(C)3.C.	The electric utility's preferred resource plan, which shall	As drafted, this subparagraph requires the electric utility to include its preferred resource plan ("PRP") in the executive summary of its IRP. It also introduces the requirements of the PRP. To make clear that the subparagraph not only requires the PRP be included, but also that it introduces the requirements of the PRP, the OPC suggests this slight modification.	Incorporated where requested	
115	Ameren Missouri	020	21.020(3)(D)	Strike "and document", "electric utility's", and "analysis", and insert ", and document the analysis, the electric utility utilized" and "(in addition to those established in the pre-IRP proceeding)" so that it reads "Describe the assumptions, inputs, and decisions, and document the analysis, the electric utility utilized in developing the alternative resource plans (in addition to those established in the pre-IRP proceeding),..."	To properly utilize the definitions of "document" and "describe"	Partially incorporated (see response for details)	Deleted the reference to 'electric utility"
116	Ameren Missouri	020	21.020(3)(D)3.	Insert "a discussion of" and strike "additional stand alone chapters that:" so it reads "Include a discussion of"	These items don't necessarily rise to the level of deserving an entire chapter	Not incorporated	The proposed structure provides organizational consistency between utilities which is a benefit to the Commission and stakeholders.
117	Ameren Missouri	020	21.020(3)(D)3.A.	Strike "outline" and "paragraph", "F", and "5" and insert "Any", "section", "B", and "12" so it reads "Outline any difference between the information ordered by the commission in section (2)(B)12 and the information..."	Mistaken reference (and below)	Partially incorporated (see response for details)	Edited to "Outlines any differences between the information ordered by the commission in paragraph (2)(B)8. and the information used by the electric utility in its IRP, along with the reasoning for those differences."
118	Ameren Missouri	020	21.020(3)(D)3.C.	Strike "paragraph", "F", and "5" and insert "B" and "12" so it reads "Address relevant emerging factors ordered by the commission under section (2)(B)12.	See above	Partially incorporated (see response for details)	The language was edited to "Addresses relevant emerging factors ordered by the commission under paragraph (2)(B)8."

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
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119	Sierra Club	020	21.020(4)(A)	**Original Text:** ~~An~~If the cost estimates the electric utility submitted in the IRP filing have materially changed, an electric utility may submit an update to the IRP filing on or before one hundred fifty (150) calendar days from the ~~r eceipt~~ submittal date of the ~~electric utility's~~IRP filing, ~~if the cost estimates have materially changed~~.	General Comment: This section omits discussion of what utilities should do in the event of cost updates that occur 150 days after filing, in the remaining 3.5 years until the next IRP. Sierra Club recommends inclusion of clear directions for how to address known cost changes during this period.	Not incorporated	Cost updates that occur after the 150 days will be addressed two ways. For projects that are not granted limited inquiry, the costs wall be addressed during the CCN process. For those that are granted limited inquiry, there is not a mechanism for addressing these changes until the rate case when the project is added to rate base. However changes in project costs for any project scheduled to be implemented during the implementation period will be included in the annual implementation report required under Rule 065(2).
120	Evergy, Inc.	020	21.020(4)(A) and (B)	(4) Cost or Other Updates to the electric utility's Pending IRP Filing. (A) If the cost estimates the electric utility submitted in the IRP filing have materially changed, or if the electric utility identifies a need to acquire a new or alternative resource (or resources) to serve one or more customers taking service under a tariff developed pursuant to Section 393.130.7 RSMo, an electric utility may submit an update to the IRP filing on or before one hundred fifty (150) calendar days from the submittal date of the IRP filing. (B) If the electric utility submits a costany such update to the IRP filing, then the electric utility shall: 1. Submit the cost updates in a format with sufficient detail to identify any changes, including cost and an explanation of any other impacts over the planning horizon for costs specified in 20 CSR 4240-21.060 and 20 CSR 4240 21.065(1). 2. Notify the stakeholders no more than ten (10) days after the electric utility identifies that an cost update pursuant to subsection (A) is needed. The electric utility shall convene discussions on the potential for requesting a modified procedural schedule to accommodate the additional review.	Evergy maintains its original proposal to edit subsection 4 language allowing an electric utility to update an IRP filing if the electric utility identifies a need to acquire new or alternative resources; requiring the update to include sufficient detail of the change, including cost and other impacts; and expanding the requirement to notify the parties if the utility needs to update its IRP Filing if cost estimates have materially changed or if a new or alternative resource needs to be acquired. Evergy continues to believe that the rule should allow updates for other material, non-cost changes and establish a process to request them. Such flexibility is needed to provide a path forward when an electric utility identifies a need to acquire a new or alternative resource or resources to serve one or more customers taking service under a tariff developed pursuant to Section 393.130.7 RSMo.	Not incorporated	The statute already allows the Commission to decide on a case by case basis if it would allow other updates besides costs. This proposed change would automatically allow any non-cost updates to be submitted.
121	Evergy, Inc.	020	21.020(4)(A) and (B)	(B) If the electric utility submits a costany such update to the IRP filing, then the electric utility shall: 1. Submit the cost updates in a format with sufficient detail to identify any changes, including cost and an explanation of any other impacts over the planning horizon for costs specified in 20 CSR 4240-21.060 and 20 CSR 4240 21.065(1). 2. Notify the stakeholders no more than ten (10) days after the electric utility identifies that an cost update pursuant to subsection (A) is needed. The electric utility shall convene discussions on the po tential for requesting a modified procedural schedule to accommodate the additional review.	Evergy maintains its original proposal to edit subsection 4 language allowing an electric utility to update an IRP filing if the electric utility identifies a need to acquire new or alternative resources; requiring the update to include sufficient detail of the change, including cost and other impacts; and expanding the requirement to notify the parties if the utility needs to update its IRP Filing if cost estimates have materially changed or if a new or alternative resource needs to be acquired. Evergy continues to believe that the rule should allow updates for other material, non-cost changes and establish a process to request them. Such flexibility is needed to provide a path forward when an electric utility identifies a need to acquire a new or alternative resource or resources to serve one or more customers taking service under a tariff developed pursuant to Section 393.130.7 RSMo.	Not incorporated	The statute already allows the Commission to decide on a case by case basis if it would allow other updates besides costs. This proposed change would automatically allow any non-cost updates to be submitted.
122	Evergy, Inc.	020	21.020(4)(A)-(B)	(4) Cost or Other Updates to the electric utility's Pending IRP Filing. (A) If the cost estimates the electric utility submitted in the IRP filing have materially changed, or if the electric utility identifies a need to acquire a new or alternative resource (or resources) to serve one or more customers taking service under a tariff developed pursuant to Section 393.130.7 RSMo, an electric utility may submit an update to the IRP filing on or before one hundred fifty (150) calendar days from the submittal date of the IRP filing. (B) If the electric utility submits a costany such update to the IRP filing, then the electric utility shall: 1. Submit the cost updates in a format with sufficient detail to identify any changes, including cost and an explanation of any other impacts over the planning horizon for costs specified in 20 CSR 4240-21.060 and 20 CSR 4240 21.065(1). 2. Notify the stakeholders no more than ten (10) days after the electric utility identifies that an cost update pursuant to subsection (A) is needed. The electric utility shall convene discussions on the potential for requesting a modified procedural schedule to accommodate the additional review.	This section continues to apply specifically to "Cost Updates." Evergy reiterates its prior recommendation to edit subsection 4 language to allow an electric utility to update an IRP filing if the electric utility identifies a need to acquire new or alternative resources; requiring the update to include sufficient detail of the change, including cost and other impacts; and expanding the requirement to notify the parties if the utility needs to update its IRP Filing if cost estimates have materially changed or if a new or alternative resource needs to be acquired. As stated previously, Evergy continues to believe that the rule should allow updates for other material, non-cost changes and establish a process to request them. Such flexibility is needed to provide a path forward when an electric utility identifies a need to acquire a new or alternative resource or resources to serve one or more customers taking service under a tariff developed pursuant to Section 393.130.7 RSMo.	Not incorporated	See previous response on Comment No. 121.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
123	Evergy, Inc.	020	21.020(5)(B)	B. The electric utility, within ~~thirty~~sixty (~~3~~60) days of its notification filing pursuant to paragraph (5)(A)1, shall include file: 1. A description of all changes to the approved preferred resource plan and the associated implementation plan; 2. The impact of each change on the annual revenue requirement; 3. The impact of the change on the financial performance measures specified in 20 CSR 4240-21.060(1)(C)3.; and 4. Any impact to the performance measures specified in the last IRP filing pursuant to 20 CSR 4240- 21.060(1);	Evergy appreciates the additional language of "B." which helps clarify Evergy's previous question that 30 day the Notification in "A." is simply a notice. Evergy remains concerned that the proposed subsequent 30-day timeframe in "B." may be insufficient to prepare and file the information and substantive requirements in subsection (B)(1-4). Evergy recommends changing this deadline to sixty (60) days on top of the thirty (30) days provided in section (5)(A)(1), for a total of ninety (90) days for the process to occur.	Not incorporated	Providing details of the change to the PRP 30 days after filing the initial notice is not overly burdensome. In addition, if additional time is needed, the electric utility can request a variance under the Commission's variance rule.
124	Sierra Club	020	21.020(5)(C)	**Original Text:** If the electric utility contends that, despite the proposed changes to its preferred resource plan identified in subsection (5)(A), certain supply-side resources previously identified by the commission, ~~shall be conducted~~ as eligible for limited inquiry CCN remain materially consistent with the approved pre ferred resource plan the electric utility shall include in its notification: 1. Identification of such supply-side resources or quantities by supply-side resource type; 2. Supporting explanation; and 3. Discussion of any impact on the electric utility's ability to timely meet customer energy needs if such supply-side resources are delayed. **A limited inquiry CCN should only issue as a result for the IRP, if the utility has complied with all requirements of the IRP Rule.**	General Comment: This appears to be the only mention of the CCN aspect of this IRP rulemaking. Sierra Club recommends that the IRP's functions and requirements as a CCN be more comprehensively described in the rulemaking. In particular, throughout the rulemaking greater clarity is needed regarding which references to 'resources' refer to generic resources and which to specific named resources. The implications for planning and evaluation that arise from each of these circumstances are quite divergent. Somewhere in the Rule, the Commission should make it clear that a limited inquiry CCN should only be issued if the utility complies with all aspects of the Rule.	Not incorporated	The basis for consideration of the limited inquiry is a finding that the preferred resource plans is reasonable and prudent, which is slightly different to the proposed language.
125	CGA	020	21.020	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 Pre-IRP Proceeding may engage in the IRP Filing Process) and describe the notice and intervention opportunity.	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.	Not incorporated	The Commission's report and order sub-process is a standard process, and therefore there is no need to outline it in this rule.
126	Liberty-Empire	020	21.020	Include waiver language and clarify timing of when to request	the current rules include waiver language, the draft rules do not. The waiver timeline in the current rule is different than the standard waiver rule in Chapter 2. Timing is important because of the pre-IRP process.	Partially incorporated (see response for details)	While the current IRP rule under Chapter 22 includes waiver and variance requirements. More recently, the Commission added a general waiver provision in 20 CSR 4240-2.205. To address the timing concern, a provision was included in Section (2)(A) to state that one of the outcomes of the pre-IRP proceeding should be to "identify any variances or waivers that may be requested."
127	New Energy Economics	025	21.025	For each material cost-risk assumption, the utility shall provide workpapers showing the source, calculation, and basis for the assumption. This shall include assumptions for delivered fuel cost, gas transportation and pipeline reservation costs, coal transportation costs, purchased-power prices, hedging costs and limitations, fuel adjustment clause exposure, large-load cost impacts, capital costs, interest rates, tax-credit assumptions, and transmission and interconnection costs. The utility shall identify whether each material cost assumption is based on generic estimates, recent bids, executed contracts, vendor quotes, utility fuel contracts, RTO/ISO data, independent forecasts, independent evaluator reports, or other market-tested evidence. Where market-tested evidence is unavailable, the utility shall explain why it is unavailable and how the assumption will be validated before implementation.	Cost-risk analysis is only useful if stakeholders can review the assumptions. Commission's proposed rule improves access to data and modeling information, but the rule should require utilities to provide clear, reproducible workpapers for fuel, market, coal, large-load, and customer-exposure assumptions.	Incorporated in a different location (see response for details)	These concepts are already included Rules 21.060 and 21.035.
128	OPC	025	21.025	Previously 20 CSR 4240-20.025(3)(A)2 Directly cited in the relevant sections of the IRP filing or testimony, demonstrating how the data supports the overall analysis and conclusions;	Previously this paragraph required the electric utility to cite its workpapers in the relevant sections of the IRP filing or testimony. It is unclear why this language has been removed. The OPC maintains that it would be helpful to know what workpapers support which testimony or sections of the IRP filing, and, therefore, suggests that it be added back in.	Incorporated with modifications (see response for details)	Modifications were made to require workpapers to be labeled corresponding to the technical volume. Additionally, the draft rule proposes requiring a process flow chart to understand the logical flow of data to decision-making process.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
129	Evergy, Inc.	025	21.025(2)(B)	~~The electric utility shall align common datasets for use in its transmission system planning, distribution system planning, and generation planning.~~	Evergy reiterates its original recommendation to strike subsection (2)(B). Practically implementing this is challenging, as datasets are planned at different levels of the system and serve different purposes. Load forecasts used for distribution system planning are evaluated independently at the peak load for each circuit and transformer, which helps identify loading or voltage issues on the distribution equipment. Therefore, the sum of the distribution forecasts totals a peak much higher than the coincident forecast used for generation planning. Additionally, as part of SPP, Evergy participates in a region-wide transmission system planning model build annually and must follow guidelines set forth to ensure consistency among all entities within the region. Accordingly, aligning every assumption in different models would be inefficient, and would likely increase costs.	Partially incorporated (see response for details)	The language was modified to replace the word "align common datasets" with "develop shared datasets that reflect the overlapping objectives of" so that it reads: "The electric utility shall develop shared datasets that reflect the overlapping objectives of transmission system planning, distribution system planning, and generation planning." The revised language requires utilities to develop datasets for overlapping objectives, while recognizing that each planning function may have differing needs.
130	Ameren Missouri	025	21.025(1)	Strike "(IRP) filing" so that it reads "...integrated resource plan that establishes and demonstrates..."		Incorporated where requested	
131	Ameren Missouri	025	21.025(1) Submitted as 21.025(2)	Insert "The content of any analysis submitted in the IRP filing docket by any other party thereto or on its behalf must enable the commission to evaluate the soundness, reliability, and transparency of the data, assumptions, methods, and analytical tools used in such analysis and underlying any other plans advocated for by such a party. "	Requirement should apply to all	Not incorporated	Electric utilities are required to file an IRP per Section 393.1900.2 RSMo, and thus it is reasonable to set standards for the electric utilities to adhere to. The rules do not require any other party to file information. Stakeholders are afforded the opportunity to bring forth to the Commission different perspectives. As with other cases, the Commission weighs the evidence offered.
132	Ameren Missouri	025	21.025(2)(A) submitted as 21.025(3)(A)	Insert "generally", "and provide documentation underlying them", and "Any other party to the IRP filing docket shall also generally describe all datasets used in any analysis submitted the party or on its behalf and provide documentation underlying them to the extent reasonably necessary to understand its analysis and conclusions" and strike "and document" so that it reads "...shall generally describe all datasets used in each IRP filing and provide documentation underlying them to the extent..."	Defined term doesn't make sense in this context - definition says describe how you complied and provide documentation underlying the analysis. We understand you want a description of the datasets and you want documentation behind them, but your definition isn't asking for that. Requirement should apply to all	Incorporated with modifications (see response for details)	The language was modified to require identification of datasets.
133	Ameren Missouri	025	21.025(2)(B) submitted as 21.025(3)(B)	Insert "to the extent reasonably possible" so that it reads "...generation planning to the extent reasonably possible/"	Absolute, perfect alignment no possible	Incorporated with modifications (see response for details)	The language was modified to replace 'align' with 'utilize common dataset'.
134	Ameren Missouri	025	21.025(3)(A) submitted as 21.025(4)(A)	Insert "and all parties to the IRP filing docket" so it reads "The electric utility and all parties to the IRP filing docket shall provide..."	Requirement should apply to all.	Incorporated in a different location (see response for details)	Added a requirement for workpapers supporting testimony to be provided with in two business days for all stakeholders. Electric utilities are required to file an IRP per Section 393.1900.2 RSMo, and thus it is reasonable to set standards for the electric utilities to adhere to. The rules do not require any other party to file information. Stakeholders are afforded the opportunity to bring forth to the Commission different perspectives. As with other cases, the Commission weighs the evidence offered.
135	Liberty-Empire	025	21.025(3)(A)2.	Clarification concerning formulas and cell references for data that is not stored in an electronic spreadsheet.	Regarding workpaper, the proposed rule states [data] provided in searchable electronic formats with all formulas, cell references, and data links intact, to allow full traceability of calculations. One obvious problem with this requirement is that not all calculations will necessarily be performed in a spreadsheet such as Excel. Much of the analysis and data could be housed in proprietary software that produces calculations and stores results. This is especially true of analyses such as Monte Carlo simulations.	Partially incorporated (see response for details)	New section (4) clarifies requirements for workpapers from models that are not spreadsheet based. Current section (3) clarifies requirements for spreadsheet workpapers.
136	Ameren Missouri	025	21.025(3)(A)2. submitted as 21.025(4)(A)2.	Strike "to allow full traceability of calculations and insert "and" so it reads "...data links intact, and..."	Impossible - neither the production cost model nor the financial model allow this - the rest of this Item 2 gives you all that can be or needs to be provided	Partially incorporated (see response for details)	"where applicable" was added.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
137	Ameren Missouri	025	21.025(3)(A)4. submitted as 21.025(4)(A)4.	Strike "Functional; and"	This adds nothing and is confusing - 2 covers it already.	Incorporated where requested	
138	Ameren Missouri	025	21.025(3)(A)5. submitted as 21.025(4)(A)5.	Strike "Contained in file sizes..."	Unreasonable and beyond the utility's control - The Commission, OPC, parties themselves need to stand up their own architecture in a manner that allows them to receive files of the size that the utility's models produce - the nature of the modeling is that the file sizes will be quite large in many cases and that can't be changed (can't do a reduced-size pdf if we are going to provide a file with formulas intact and data links intact)	Partially incorporated (see response for details)	Document files shall be sized to upload to the commission's electronic filing system, unless otherwise agreed by stakeholders.
139	Evergy, Inc.	025	21.025(3)(B)	(3)Workpapers. ~~(B) Each electric utility's workpaper shall contain an inputs tab that includes the following information, at a minimum, for each variable utilized in each workbook or model:~~ ~~1.Any assumptions used; 2.Identification of each variable utilized;~~ ~~3.Clear definition of the variable;~~ ~~4.Variable value range; and~~ ~~5.Citations of source information utilized to develop the variable value range.~~ ~~(C)The electric utility shall provide a process flow diagram that provides graphical representation of the interaction between inputs, modeling software, and results that is produced in support of the IRP filing. The electric utility shall describe and document the process flow diagram so that reviewers understand the logical flow from data through the decision-making process to plan recommendations.~~ ~~(D)The electric utility shall provide a summary workbook that indicates the interaction of linked workpapers provided in support of the IRP filing, including the sources of information utilized for each process and the file location in which the underlying information is provided.~~	Evergy maintains its original comments that these workbooks requirements are overly prescriptive. In practice, this level of prescription will increase documentation burden and clutter without necessarily improving transparency, as utilities may be forced to populate fields mechanically just to satisfy the rule rather than to clarify key modeling choices. Evergy therefore recommends striking this subsection and instead allowing utilities to organize workpapers in a manner that clearly and reasonably explains key inputs, assumptions, and sources, subject to staff and intervenor discovery if additional detail is needed. Furthermore, Evergy is not opposed to summarizing its workpapers. However, sources are already cited in the workbooks. Because sources are already provided, requiring an additional "interaction of linked workpapers" with sources and their location would be overly prescriptive and administratively burdensome, potentially increasing costs. Evergy recommends striking this portion of the requirement.	Partially incorporated (see response for details)	The rule requires workpapers, however, major modifications were made as compared to the draft for comment version.
140	Ameren Missouri	025	21.025(3)(B) Submitted in redline markup, not in comment table	(3)Workpapers. ~~(B) Each electric utility's workpaper shall contain an inputs tab that includes the following information, at a minimum, for each variable utilized in each workbook or model:~~ ~~1.Any assumptions used; 2.Identification of each variable utilized;~~ ~~3.Clear definition of the variable;~~ ~~4.Variable value range; and~~ ~~5.Citations of source information utilized to develop the variable value range.~~		Partially incorporated (see response for details)	The rule requires workpapers, however, major modifications were made to this section during this revision. The requirements are moved to section (4) and reflect the intent of the workpapers and how each workpaper is related to others.
141	Ameren Missouri	025	21.025(3)(C) submitted as 21.025(4)(B)	Strike "describe and document" and insert "provide a reasonably detailed narrative description of the steps reflected in" so that it reads "...shall provide a reasonably detailed narrative description of the steps reflected in the process..." and insert "Any party to the IRP filing docket that submits or has submitted on its behalf alternative plan recommendations shall provide the same diagram and description as required of the electric utility to support its alternative recommendations. "	How does one "describe" a process flow diagram - the diagram is observable, e.g., Staff did not "describe" its various diagrams; instead, it provided them and labelled them How does one "document" a diagram - the diagram is the documentation. And again, the definition of "describe and document" doesn't fit here - the process flow diagram isn't an analysis. Requirement should apply to all.	Partially incorporated (see response for details)	The language was modified to read: "The electric utility shall provide a process flow diagram that shows the interaction between inputs, modeling software, and results to support the IRP. " Electric utilities are required to file an IRP per Section 393.1900.2 RSMo, and thus it is reasonable to set standards for the electric utilities to adhere to. The rules do not require any other party to file information. Stakeholders are afforded the opportunity to bring forth to the Commission different perspectives. As with other cases, the Commission weighs the evidence offered.
142	Ameren Missouri	025	21.025(3)(D) submitted as 21.025(4)(C)	Strike "interaction of linked" and "including the sources of information utilized for each process and file location in which the underlying information is provided" so that it reads "The electric utility shall provide a summary workbook that indicates the workpapers provided in support of the IRP filing." Insert " All other parties to the IRP filing docket shall submit workpapers in support of their responses to or proposed alternatives to the plans reflected in the electric utility's IRP filing. "	The need is already addressed in the specification of what must be in the workpapers - intact links, formulas, etc. - so unnecessary relative to value (if any) it would provide. Requirement should apply to all.	Partially incorporated (see response for details)	Major modifications were made as compared to the draft for comment version. Electric utilities are required to file an IRP per Section 393.1900.2 RSMo, and thus it is reasonable to set standards for the electric utilities to adhere to. The rules do not require any other party to file information. Stakeholders are afforded the opportunity to bring forth to the Commission different perspectives. As with other cases, the Commission weighs the evidence offered.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
143	Ameren Missouri	025	21.025(3)(E) submitted as 21.025(4)(D)	Insert "and all parties to the IRP filing docket" so that it reads "The electric utility and all parties to the IRP filing docket shall provide..."	Requirement should apply to all.	Partially incorporated (see response for details)	Electric utilities are required to file an IRP per Section 393.1900.2 RSMo, and thus it is reasonable to set standards for the electric utilities to adhere to. The rules do not require any other party to file information. Stakeholders are afforded the opportunity to bring forth to the Commission different perspectives. As with other cases, the Commission weighs the evidence offered.
144	Ameren Missouri	025	21.025(3)(F)2. submitted as 21.025(4)(E)2.	Insert "The same requirements shall apply to materials used to support filings of other parties to the IRP filing docket in response to the electric utility's IRP filing."	Requirement should apply to all.	Partially incorporated (see response for details)	Electric utilities are required to file an IRP per Section 393.1900.2 RSMo, and thus it is reasonable to set standards for the electric utilities to adhere to. The rules do not require any other party to file information. Stakeholders are afforded the opportunity to bring forth to the Commission different perspectives. As with other cases, the Commission weighs the evidence offered.
145	Evergy, Inc.	025	21.025(4)	(4) The electric utility shall provide plot data in electronic format, such as an Excel file. ~~Plots.~~ ~~(A) The electric utility shall label each plot included in the IRP filing as a stand-alone figure, and shall label the axis with the units of measure.~~ ~~(B) The electric utility shall provide the data in each plot in tabular form in the workpapers.~~ ~~(C) The electric utility shall number, reference, and explain all plots and data tables in the text of the technical volumes and the workpapers.~~	Evergy maintains its original comments that this proposed rule, even with the new redlines, remains overly burdensome. Compliance would require a utility to revisit every workpaper after final numbering of the plots, significantly increasing the Company's administrative burden and costs. Moreover, the level of explanation required for each plot is undefined and it may be impractical to provide data in each plot for complex visualizations. This may increase unnecessary business operations. Evergy is amenable to providing an Excel file with easy-to-follow plot data, rather than providing data for every plot in a document. Evergy is also unclear whether the Commission's filing system can accommodate the level of data detail required here and throughout the proposed rules. Every proposes this subsection be revised to require only plot data in electronic format.	Not incorporated	These requirements are similar but less cumbersome than the existing rule in Chapter 22. See definition of Plot in 20 CSR 4240-22.020(44) which required plot data to be published in the body of the technical volumes. Draft rule requires tabular plot data to be provided in workpapers only.
146	Ameren Missouri	025	21.025(4)(C) submitted as 21.025(5)(C)	Insert as new (C) "All other parties to the IRP filing docket shall also label each plot and provide the data contained in or underlying that party's responses to the electric utility's IRP filing in the same manner required of the electric utility in sub-subsections (A) and (B)." Move current (C) to (D)	Requirement should apply to all.	Partially incorporated (see response for details)	Electric utilities are required to file an IRP per Section 393.1900.2 RSMo, and thus it is reasonable to set standards for the electric utilities to adhere to. The rules do not require any other party to file information. Stakeholders are afforded the opportunity to bring forth to the Commission different perspectives. As with other cases, the Commission weighs the evidence offered.
147	Ameren Missouri	025	21.025(4)(D) submitted as 21.025(5)(D)	New (D) per Line 130. Strike "and the workpapers"	Already described in the technical volumes; the workpapers have prescribed requirements above; what is the purpose of requiring all this effort for intermediate type tables and aren't used in the filing itself?	Incorporated where requested	
148	Evergy, Inc.	025	21.025(5)	~~(5) Citations within text.~~ ~~(A) The electric utility shall describe and document all scenario and sensitivity assumptions, data inputs, modeling assumptions, modeling files and results, and rationale for inclusion or exclusion to enable stakeholder review, replication, and independent evaluation.~~ ~~(B) For every data point referenced in the IRP filing, the electric utility shall provide a specific citation to the underlying workpaper file name, and tab from which the data was sourced.~~	Evergy maintains its original comments that this proposed rule remains overly burdensome. Evergy remains unclear what is meant by "[a]ll" scenario and sensitivity assumptions, data inputs, etc. being clearly documented, and the new rule does not appear to clarify. Similarly, Evergy is unclear what is meant by "every data point referenced in the IRP filing," as that could include countless pieces of data. Compliance would likely drive significant administrative burdens. Evergy recommends striking these requirements.	Incorporated where requested	
149	Ameren Missouri	025	21.025(5)(A) submitted as 21.025(6)(A)	Insert " together with reasonable documentation of the same, and shall also and provide a reasonably detailed narrative outlining the"	Same comment as above - documentation requirement should be reasonable - Commission can resolve disputes if someone doesn't think it's reasonable. We did not strike "inclusion or exclusion", inclusion or exclusion of what? – pending gaining an understanding of intent.	Not incorporated	The comment is no longer relevant as the draft rule language was removed.
150	Ameren Missouri	025	21.025(6) submitted as 21.025(7)	Insert " and any other party to the IRP docket shall include an indication of whether relevant costs and benefits in their respective filings are expressed in real or nominal dollars" and strike "express all costs and benefits in nominal dollars."	Requirement should apply to all "costs" is broad - there are a lot of instances where use of real dollars is appropriate	Incorporated in a different location (see response for details)	This language was moved from Rule 21.025 into Rule 21.015, under the definition of 'cost', which requires nominal dollars.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
151	Evergy, Inc.	025	21.025(7)	~~(7) Within two (2) business days of the electric utility submitting the IRP filing, the electric utility shall make available to stakeholders all data, modeling inputs, assumptions, and results for the alternative resource plans pursuant to 20 CSR 4240-21.060(4) and for all risk scenarios and sensitivity analyses pursuant to 20 CSR 4240-21.060(4).~~	Evergy maintains its original comments that this proposed rule remains overly burdensome. The Company reiterates this rule is unnecessary, as it provides stakeholders with information supporting the filing to parties, either in the filing itself or as data requests. Moreover, requiring the utility provide "all data" remains vague, and the updated rules do not clarify this overly burdensome requirement.	Partially incorporated (see response for details)	The language was clarified to address Evergy's concern about "all data" being vague. It is common for supporting workpapers to be provided shortly after filing. The intent of this provision is to ensure consistency of data and information submitted to streamline stakeholder's review.
152	Sierra Club	025	21.025(7)	**Original Text:** ~~The~~ Within two (2) business days of the electric utility submitting the IRP filing, the electric utility shall make available to ~~the stakeholder group~~stakeholders all data, modeling inputs, assumptions, and results for the ~~preferred~~alternative resource ~~plan~~ plans pursuant to 20 CSR 4240-21.060(4) and for all ~~major~~risk scenarios and sensitivity analyses, ~~not solely for a single base case.~~ pursuant to 20 CSR 4240-21.060(4). **Sierra Club Suggestion for Revised Text:** ~~The~~ Within two (2) business days of the electric utility submitting the IRP filing, the electric utility shall make available to ~~the stakeholder group~~stakeholders all data, modeling inputs, assumptions, ~~and~~ results, **workpapers, and other referenced materials** for the **preferred and** alternative resource ~~plan~~ plans pursuant to 20 CSR 4240-21.060(4) and for all ~~major~~risk scenarios and sensitivity analyses, ~~not solely for a single base case.~~ pursuant to 20 CSR 4240-21.060(4).	Sierra Club recommends adding "workpapers" and "other referenced materials" to "all data, modeling inputs, assumptions, and results" for a more comprehensive request. The Commission should replace "for the alternative resource plans" with "for the preferred and alternative resource plans" to clarify that detailed materials regarding the development of the preferred resource plan are required. (This improved language would reduce the risk that "alternative resource plans" be misconstrued as not inclusive of the preferred resource plan.)	Not incorporated	Major modifications were made as compared to the draft for comment version to address utility comments. However, the language was modified to include reference to datasets used in analysis, spreadsheet workpapers, and model workpapers.
153	Evergy, Inc.	025	21.025(8)	~~(8) The electric utility shall provide staff and public counsel reasonable access to modeling software, tools, standards, formatting and data files the electric utility used for the purpose of verifying results or performing 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.~~	Evergy maintains its opposition to this requirement that this proposed rule remains overly burdensome. This requirement extends well beyond the scope of Section 393.1900 RSMo, as nothing in the statute requires the utility provide such access to proprietary modeling software to parties, much less bear all costs with providing such access. Furthermore, nothing in Section 393.1900 RSMo requires Staff or OPC to create their own resource plans for purposes of evaluating a utility's proposed plan. Furthermore, the updated draft rule fails to address the concern that access to modeling software and data sets could potentially breach licensing agreements which restrict the license to Evergy, its affiliates, and third-party providers. The proposed rule would force the Company to potentially violate licensing agreements. Additionally, it is unclear whether Staff and OPC meet necessary cybersecurity and IT standards for access to the utilities systems. To the extent it would not violate licensing agreements, Evergy can share data used in the modeling, but cannot grant Staff and OPC access to or use of its modeling software.	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
154	Liberty-Empire	025	21.025(8)	Clarification regarding providing stakeholders modelling software tools and concerns about any requirements to mandate the IRP modelling software tools.	In the proposed Standards and Dataset Management Requirements it states: The electric utility shall provide staff and public counsel reasonable access to modeling software, tools, standards, formatting and data files the electric utility used for the purpose of verifying results or performing 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. This section of the proposed rule seems very problematic. What does access to modeling software and tools mean exactly? For a study that is conducted once every four years, the Company may not license or have seats to any or all of the software utilized in such a rigorous study. Generally, consultants who specialize in the various aspects of the IRP study are hired and they make use of the software for which they have expertise and have proper authorized access. The software choice could change over time if different consultants are utilized, or if the same consultants, at their own discretion, change software. In order to minimize costs, the Company may not have access to, or the training needed to make use of this proprietary software used by their consulting team. Is the Company now required to bear the cost of providing software to others who likely are not trained users of the software? The Company would also have issues if this part of the proposed rule is mandating common IRP modeling tools within the state of Missouri. One size does not fit all, and the Company should be able to select their own consulting team, if desired, without having the limitations on which planning tools must be used. Having the freedom to select appropriate IRP software tools and consultants could also be a key factor in helping to manage IRP costs.	Incorporated where requested	Concern expressed in comment is resolved as the draft rule language was removed.
155	CGA	025	21.025(8)	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.	Not incorporated	The comment is no longer relevant as the draft rule language was removed.
156	Renew Missouri	025	21.025(8)	(8) The electric utility shall provide staff, and public counsel, and a limited number of intervening stakeholders reasonable access to modeling sof tware, tools, standards, formatting and data files the electric utility used for the purpose of verifying results or performing 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.	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.	Not incorporated	The comment is no longer relevant as the draft rule language was removed.
157	Ameren Missouri	025	21.025(8) submitted as 21.025(9)	Insert "Subject to their ability to securely receive and house the same," and strike "formatting and data files" and "The electric utility shall bear all costs of compliance for this section" so that it reads "Subject to their ability to securely receive and house the same, the electric utility shall provide staff and public counsel reasonable access to modeling software, tools, & standards, the electric utility used for the purpose of verifying results or performing independent modeling runs as the commission designated in conformance with section 393.1900.1(5) RSMo".	Nothing in the statute dictates that utilities must fund licenses, IT infrastructure, etc. necessary for Staff or OPC to have this access. Note that .025 as we understand it is already broadly defined to ensure formatting and data files are accessible	Not incorporated	The comment is no longer relevant as the draft rule language was removed.
158	OPC	030	20.030(6)(A)3.	Large load project's anticipated service ~~location address~~	As drafted, this paragraph requires the electric utility to maintain a database that identifies, in part, a large load project's "anticipated service location." However, this can be interpreted broadly. Because the amount of investment to site one of these projects can vary widely by location, the OPC suggests this change so that more granular data can be tracked.	Incorporated where requested	
159	New Energy Economics	030	21.030	For each large load or group of large loads that materially affects resource need, the utility shall evaluate cost-causation, load certainty, load flexibility, load ramping, customer-supplied resources, financial security, exit risk, delayed-load risk, and nonparticipating-ratepayer impacts. The utility shall identify whether large-load-driven resource additions or market purchases create fuel-cost exposure, purchased-power exposure, stranded-cost risk, transmission-cost risk, or cost shifts to residential, small business, municipal, school, or other nonparticipating customers.	Large-load growth can materially increase customer cost risk by driving new generation, transmission upgrades, fuel purchases, and market purchases. Commission's proposed rule improves large-load tracking, but it should also require cost-causation and customer-protection analysis.	Not incorporated	The large load statute (393.130) requires electric utilities to "reasonably ensure such customers' rates will reflect the customers' representative share of the costs incurred to serve the customers and prevent other customer classes' rates from reflecting any unjust or unreasonable costs arising from service to such customers." Therefore these proposed changes are already addressed both in the statute and the large load tariffs approved by the commission.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
160	OPC	030	21.030	Previously 20 CSR 4240-20.030(1)(G) The electric utility shall include data for ~~existing~~ large load customers, including, but not limited to, data centers, industrial manufacturing facilities, and other customers expected to materially affect system demand and include documentation on assumptions regarding load size, seasonal load shape, timing, and probability.	Previously this subsection appeared to require an electric utility to identify certain information on existing large load customers in completing its Load Forecasting Inputs and Assumptions. It is unclear why this language has been removed. The OPC maintains that it would be helpful to know this information and suggests that it be added back in with the slight modification noted so that it is a complete sentence.	Incorporated in a different location (see response for details)	The concepts mentioned in the previous version were already incorporated in changes made to 21.030(5) & 21.030(6). No additional changes are needed.
161	Sierra Club	030	21.030(1)(A)	**Original Text:** The electric utility shall develop load forecasts using the best available, transparent, and verifiable data. ~~The electric utility shall document that it is using the best available data.~~ Where reliable data is not availa ble, the electric utility may use estimates only for variables ~~involving customer behavior, new technologi es, or market trends for which no historical data exists~~, provided that the ~~variables are~~ electric utility fully ~~justified~~ justifies and clearly ~~documented~~ documents the estimates. **Sierra Club Suggestion for Revised Text:** The electric utility shall develop load forecasts using the best available, transparent, and verifiable data. ~~The electric utility shall document that it is using the best available data.~~ ~~Where reliable data is not avail able, the electric utility may use estimates only for variables~~ The following variables may be estimated ~~in volving customer behavior, new technologies, or market trends for which no historical data exists~~, provid ed that the ~~variables are~~ electric utility fully ~~justified~~ justifies and clearly ~~documented~~ documents the esti mates: Any limited inquiry CCN that is issued as a consequence of the IRP shall be based on the high probability load forecast.	Sierra Club recommends against these changes which substantially weaken this section. It is important for accountability and transparency that utility documents are using the best available data. The limitations on what variables may be estimated are also critical. It would be preferable if the Commission provided a list of which variables can be estimated. For large load customers, there is a presumption that such loads should be included in the base forecast only when binding electric service agreements are signed (i.e., phases 3, 4, and 5 as outlined in IRP Rule 030 (6)).	Not incorporated	The intent is not to be prescriptive by providing an exhaustive list of variables to be estimated. Forecasting requires flexibility to account for relevant emerging factors and system specific conditions.
162	Evergy, Inc.	030	21.030(1)(B)	The electric utility shall maintain and annually update a comprehensive database of historical energy usage and demand across its service territory covering at least the most recent five (5) years for hourly data and twenty (20) years for monthly data preceding the filing year approved by the commission. The database shall include ~~all~~ ~~the~~ ~~customer class~~es ~~and service voltages and capture hourly, daily, and monthly energy consumptio n, customer counts, monthly peak demand levels (coincident and non-coincident peaks by customer class), and annual peak demand (reported separately for summer and win ter for both coincident and non-coincident peaks by customer class)~~ ~~attribute and energy consumption information~~ ~~necessary to meet t he requirements in 20 CSR 4240-21.030(2)-(4).~~	Evergy is unclear on the rule's requirement to annually update a compressive database. Given resource plan filings are provided quadrennial, further clarification is needed to give utilities clear, objective guidance on what annual updates are required and whether such updates must be maintained internally at the utilities or filed with the Commission. Evergy understands, based on the technical session discussion with Staff, that paragraph (1)(B) is intended to refer only to the voltage-related data needed for losses, and Evergy's original redline reflected that understanding. Nothing in the updated rule indicates that this understanding of Staff's intent is incorrect. Accordingly, Evergy maintains its original recommendation.	Partially incorporated (see response for details)	The language was modified by striking 'annually update'. The bulk of this language comes from the current rule in Chapter 22, for which the electric utilities have the information. The new requirement is that the electric utilities will be required to submit the information as part of their IRP filing.
163	Ameren Missouri	030	21.030(1)(C)	Insert "weather-sensitive" so it reads "...normalize all weather-sensitive historical load data..."	If the load isn't weather sensitive then there is nothing to normalize; rule should not assume that all loads are weather sensitive, which is arguably implied by the language	Incorporated where requested	
164	Ameren Missouri	030	21.030(1)(E)	Strike "The electric utility shall describe and document the descriptive statistics for each end use".	We don't have this - in most cases we have values taken from reports but not descriptive statistics as defined	Incorporated where requested	
165	Midwest Energy Efficiency Alliance	030	21.030(1)(E)	Where employing end-use forecasting, the electric utility shall use the most current available data on ~~appliance~~ measure saturation, efficiency trends, and customer adoption of new technologies, including distributed energy resources (DER) and demand-side measures. The electric utility shall describe and document the descriptive statistics for each end-use.	*As noted above*	Incorporated where requested	
166	Sierra Club	030	21.030(1)(E)	**Original Text:** Where employing end-use forecasting is employed, the electric utility shall use the most current available data on appliance saturation, efficien cy trends, and customer adoption of new technologies, including distributed energy resources (DER) and demand- side measures. Descriptive The electric utility shall describe and document the descriptive statistics for each end-use variable shall be described and documented. **Revised Text:** Where employing end-use forecasting is employed, the electric utility shall use the most current available data on appliance saturation, efficien cy trends, and customer adoption of new technologies, including distributed energy resources (DER) and demand-side measures. Descriptive The electric utility shall describe, and document, and provide the descriptive statistics for ea ch end-use variable shall be described and documented. measures. ~~Descriptive~~ The electric utility shall describe, and document, and provide the descriptive statistics for ea ch end-use ~~variable shall be described and documented.~~	The Commission should change "the utility shall describe and document the descriptive statistics" to "the utility shall describe, document, and provide the descriptive statistics." This addition ensures that the utility is aware of its requirement to provide these statistics to stakeholders.	Partially incorporated (see response for details)	Modified definition of "descriptive statistics". Modified definitions to split "describe" and "document" and added other terms. Modified 030(1)(L) to read: "The electric utility shall document descriptive statistics for key data inputs."

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
167	Ameren Missouri	030	21.030(1)(F)	Strike "and" and insert "or" so that it reads "...income, economic growth, or other economic..."	Not all of these may materially influence load at a given time	Not incorporated	Changing the word to 'or' would make the entire list optional. To ensure a transparent forecast, the baseline drivers listed have to be provided. If the electric utility determines that a specific driver is not materially influencing load during a particular point in time, they can provide the data alongside a brief explanation showing why its impact is low, but not to omit the data entirely.
168	Liberty-Empire	030	21.030(1)(G)	Clarification of the type of data required. It should not mean the quantification of each policy or mandate on the forecast.	It is helpful that the last sentence in the previous version was eliminated which stated, "the electric utility shall quantify and document the expected load impacts of each applicable policy or mandate." The quantification of each policy or mandate is likely too cumbersome to implement, and the old version implied that each law or regulation is modeled for impact. But it may still be a bit troublesome since the new wording states, "to include data for applicable federal, state, and local laws, regulations, and policies that affect energy consumption, including energy efficiency standards, electrification initiatives, and decarbonization requirements." What is meant by "data" in this passage? Is it still meant to quantify the load impacts?	Incorporated where requested	
169	Sierra Club	030	21.030(1)(G)	**Original Text:** ~~Applicable~~The electric utility shall include data for applicable federal, state, and local laws, regulations, and policies that affect energy consumption, including energy efficiency standards, electrification initiatives, and decarbonization requirements. ~~The electric utility shall quantify and document the expected load impacts of each applicable policy or mandate.~~ **Sierra Club Suggestion for Revised Text:** ~~Applicable~~The electric utility shall include data for applicable federal, state, and local laws, regulations, and policies that affect energy consumption, including energy efficiency standards, electrification initiatives, and decarbonization requirements. **The electric utility shall quantify and document the expected load impacts of each applicable policy or mandate.**	Sierra Club recommends not to strike the last sentence; its removal substantially weakens this section. Robust load forecast modeling and documentation should include the expected load impacts of policies and mandates.	Not incorporated	Utilities generally rely on EIA data for future energy efficiency or intensity trends. EIA incorporates future policies/regulations, but does not discretely break out those impacts from other trends making precise quantification of each policy impact impossible.
170	Liberty-Empire	030	21.030(1)(I)	Energy efficiency assessment and the optimized capacity expansion modeling take place after the load forecast is developed. Therefore, the load forecast should not be concerned with energy efficiency potential assessment.	This seems to imply that whatever is in the potential study should be included in the forecast. We have generally excluded the potential study impacts from the load forecast because potential studies tell you what is possible, but they do not describe what will be done. By including these in the forecast, you assume that energy efficiency measures are more cost effective than other supply side options. It is better to compare the potential study results with supply options to find the most cost-effective solutions.	Partially incorporated (see response for details)	The language was modified to remove the reference to the forecast aligning with energy efficiency and then included "natural energy efficiency" as one of baseline conditions.
171	Midwest Energy Efficiency Alliance	030	21.030(1)(I)	The electric utility shall ensure the forecast is generally aligned with the energy efficiency potential assessment, including alignment of baseline conditions such as new housing and commercial building starts, ~~appliance~~ measure saturations, employment growth, federal standards, building codes, and program offerings.	*As noted above*	Incorporated where requested	
172	Sierra Club	030	21.030(1)(I)	**Original Text:** The electric utility shall ensure the forecast ~~shall be internally consistent~~ is generally aligned with the energy efficiency potential assessment, including alignment of baseline conditions such as new housing and commercial building starts, appliance saturations, employment growth, federal standards, building codes, and program offerings. **Sierra Club Suggestion for Revised Text:** The electric utility shall ensure the forecast ~~shall be internally consistent is generally aligned~~ be internally consistent with the energy efficiency potential assessment, including alignment of baseline conditions such as new housing and commercial building starts, appliance saturations, employment growth, federal standards, building codes, and program offerings.	Sierra Club recommends against this revision. The term "generally aligned" is less robust in comparison to "internally consistent." Consistency with energy efficiency potential assessments is a critical part of accurate load forecasting.	Not incorporated	Edit from "discussion draft" to "for comment version" based on utility comments. At this time, the IRP drafting team did not incorporate this recommendation.
173	Ameren Missouri	030	21.030(1)(J)	Strike "electrified heating, such as heat pumps," so that it reads "...adoption of electric vehicles, and other electrification technologies..."	We use an energy intensity measures - don't have data specific to electrified heating	Incorporated where requested	
174	Ameren Missouri	030	21.030(1)(K)	Strike "accounts for" and insert "considers" so it reads "...forecast considers the effects of..."	See comment in (4)(D)4 below	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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175	Liberty-Empire	030	21.030(1)(K)	Clarity is needed on how the effects of electricity prices can impact the load forecast when the forecast is completed before the optimization and financial modelling is completed.	The requirement is that the utility shall ensure the forecast accounts for the effects of electricity prices, real price of competitive energy sources, and rate design on customer usage. 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. Timing can be an issue with this requirement as the IRP load forecast is typically one of the first analysis completed. For example, the future real price of electricity from the IRP study would not be known at the time the load forecast is developed. Also, the IRP has many different alternate plans, and each plan can have a different price of electricity, different demand response programs, etc.	Partially incorporated (see response for details)	Removed elasticity from load forecast, but kept it in Rule 21.060.
176	Renew Missouri	030	21.030(1)(K)	(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 electrification alternatives, and rate design on customer usage. 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.	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.	Not incorporated	The existing language contemplates price elasticity, as this considers how energy sales are affected by changes in costs.
177	Sierra Club	030	21.030(1)(K)	**Original Text:** The electric utility shall ensure the forecast ~~shall account~~accounts for the effects of electricity prices, ~~competing fuel prices~~ real price of competitive energy sources, and rate design on customer usage. ~~This~~ The electric utility shall include the price elasti city of demand, ~~demand response programs,~~ and the impacts of approved ~~or pending~~ rate structures suc h as time-of-use rates, demand charges, and dynamic pricing mechanism. **Sierra Club Suggestion for Revised Text:** The electric utility shall ensure the forecast ~~shall account~~accounts for the effects of electricity prices, ~~competing fuel prices~~ real price of competitive energy sources, and rate design on customer usage. ~~This~~ The electric utility shall include the price elasti city of demand, ~~demand response programs,~~ **and** the impacts of approved ~~or pending~~ rate structures suc h as time-of- use rates, demand charges, and dynamic pricing mechanism, **and provide reporting that includes forec asts with and without electricity price effects and the utility's methodology for incorporating this effects in its forecasts.**	Sierra Club recommends the addition of language regarding reporting and/or demonstrating that the forecasts provided take electricity price effects into account and provide the methodology used.	Not incorporated	The rule already requires the electric utility to ensure the forecast incorporates the effect of electricity prices, therefore providing a separate 'with and without' price comparison is redundant.
178	Ameren Missouri	030	21.030(2)(D)1.	Strike "and document" and "data inputs" and insert "and" and "provide the data inputs and documentation of their source" so it reads "Describe the model structure and functional form and provide the data inputs and documentation of their source."	This is apparently what is intended - define doesn't make sense when applied to entire sentence	Partially incorporated (see response for details)	Struck "and document" for the model structure and functional form. Did not strike out "document the data inputs" since the rule includes a new definition for 'document' that means the provision of all supporting information.
179	Ameren Missouri	030	21.030(2)(D)3.	Strike "demonstrate that" and "and document" and insert "explain how" and "and any documentation relied upon to determine them." so it reads "The electric utility shall explain how the resulting forecast achieves a level of rigor, transparency, and detail that is comparable to an econometric load forecast; and shall describe the advantages, tradeoffs, and limitations of the selected methodology and any documentation relied upon to determine them."	Demonstrate implies a level of quantification or proof that may not be possible and while the definition to some extent could work the definition refers to "an analysis" - a methodology is not an "analysis" so inapplicable here.	Incorporated with modifications (see response for details)	This has been modified based on the new definition for 'Justify'
180	Ameren Missouri	030	21.030(2)(D)4.	we have concerns about load forecasting 030(2)(D)4 using "describe and document the advantages, tradeoffs, and limitations of the selected methodology." It is unclear what detailed analysis would be required to satisfy the "document" standard here.		Incorporated where requested	
181	Ameren Missouri	030	21.030(2)(F)	Strike "and document" and insert "describe" so it reads "...shall describe the equations..."	Again, these themselves are not analysis - they are components of or methods used to perform an analysis	Not incorporated	The regression equations from the SAE model needs to have documented ANOVA and goodness of fit tests, as well as supporting documentation for other aspects of model construction.
182	Ameren Missouri	030	21.030(2)(H)	Strike "and document" so it reads "...shall describe the estimation techniques..."	Again, these themselves are not analysis - they are components of or methods used to perform an analysis	Incorporated where requested	
183	Ameren Missouri	030	21.030(2)(H)2.	Strike "the" and insert "any" so it reads "Description of any calibration..."	There may not be any such models	Incorporated where requested	
184	Ameren Missouri	030	21.030(2)(I)	Strike "and document" so it reads "...shall describe how the model incorporates..."	The models, variables, and sensitivities are not an analysis - how does one document how something does something?	Incorporated with modifications (see response for details)	Language changes made due to the new definitions of describe, and document.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
185	Evergy, Inc.	030	21.030(2)(I)	(I) The electric utility shall describe and document how the model incorporates weather variables~~, and captures the sensitivity of load to key weather variables such as temperature, and degree-days~~.	This rule's requirement that the utility explain the sensitivity of load to weather variables remains overly prescriptive. Section 393.1900 RSMo, simply requires "forecasts of the electrical corporation's sales by hour under reasonable scenarios," which does not compel granular, variable-by-variable weather sensitivity analysis. Evergy maintains that the rule should not exceed the statute's level of specificity and should not impose prescriptive requirements regarding the sensitivity of load to particular weather variables.	Not incorporated	Weather is a key driver of hourly electric load, so it is important that forecasting models reflect how load responds to variables, such as temperature and degree-days. Requiring electric utilities to explain this relationship helps ensure forecasts are reasonable and transparent.
186	Evergy, Inc.	030	21.030(2)(K)1.	~~1.The electric utility shall validate the forecast results through benchmarking against historical load patterns and against any available independent forecasts published by regional transmission organizations, government agencies, or other credible sources;~~	Evergy maintains its original recommendation to strike the overly prescriptive requirements requiring the utility to validate its forecast results through benchmarking. The Company's forecasts can be validated by stakeholders without these requirements being embodied in the rules. Moreover, the phrase "any available independent forecasts published by...other credible sources" is essentially unbounded. This is an open-ended research obligation that could consume significant analytical resources and generate disputes about which sources the utility failed to consider.	Partially incorporated (see response for details)	While stakeholders maintain the right to review and draft comments on filings, the burden of demonstrating forecast accuracy falls on the electric utility. Requiring the electric utility to compare its forecast against historical load patterns and official government forecasts is for accountability and transparency.
187	Ameren Missouri	030	21.030(2)(K)2.	Strike "shall identify an identification of sources of error or bias, and shall explain an explanation of how the electric utility used these findings to improve the current forecast" so it reads "...past forecasts and an evaluation of forecast accuracy; and".	Really burdensome and/or infeasible in complex models used for forecasting to do a port-mortem on all of the assumptions and determine which ones led to variances/biases.	Incorporated with modifications (see response for details)	The language has been revised to focus only on identifying sources of significant error or bias.
188	Ameren Missouri	030	21.030(2)(K)3.	Strike "describe and document" and "create" and insert "provide" so it reads "The electric utility shall provide a forecast of net system..."	A forecast is not an analysis - it is the result of analysis that the utility provides.	Incorporated with modifications (see response for details)	The language has been revised to retain 'document' in light of Staff's new definition of 'document', which clarifies that it means the provision of supporting information.
189	Renew Missouri	030	21.030(2)(K)3.	3. The electric utility shall describe and document a forecast of net system load profiles for each year of the planning horizon. The electric utility shall ensure the net system load forecast is consistent with the electric utility's forecasts of monthly energy and peak demands at the time of summer and winter system peaks for each customer class. 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 resources may reduce, shift, or otherwise modify system peak demand and energy requirements over the planning horizon.	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.	Incorporated with modifications (see response for details)	Included concept. Reorganized following SOS rulemaking style guide.
190	Sierra Club	030	21.030(3)(K)	**Original Text:** ~~Provide~~ The electric utility shall provide full documentation of all methodologies, assumptions, and data sources sugicient for replic ation, as outlined in 20 CSR 4240-21.025. Additionally~~—~~: 1. The electric utility shall validate the forecast results ~~shall be validated~~ through benchmarking against historical load patterns and against any available independent forecasts published by regional transmission organizations, government agencies, or other credible sources.; 2. The ~~documentation~~ electric utility shall~~include~~ describe and document a retrospective analysis of past forecasts, ~~evaluating~~ an evaluation of forecast accuracy, ~~identifying~~ an ident ification of sources of error or bias, and ~~explaining~~ an explanation of how the electric utility used these findings ~~were used~~ to improve the current forecast.; and 3. The electric utility shall ~~produced~~describe and document a forecast of net system load profiles for each year of the planning horizon. ~~The~~The electric utility ~~sh all~~ ensure the net system load forecast shall beis consistent with the electric utility's forecasts of monthly energy and peak demands at the time of summer and winter system peaks for each customer class. **Sierra Club Suggestion for Revised Text:** ~~Provide~~ The electric utility shall provide full documentation of all methodologies, assumptions, and data sources sugicient for replication, as outlined in 20 CSR 4240-21.025. Additionally~~—~~: 1. The electric utility shall validate the forecast results ~~shall be validated~~ through benchmarking against historical load patterns and against any available independent forecasts published by regional transmission organizations, government agencies, or other credible sources.; 2. The ~~documentation~~electric utility shall~~include~~describe and document a retrospective analysis of past forecasts, ~~evaluating~~ an evaluatio n of forecast accuracy, ~~identifying~~ an identification of sources of error or bias, and explaining an explanation of how the electric utilit y used these findings ~~were used~~ to improve the current forecast.; and 3. The electric utility shall ~~produced~~describe and document a forecast of net system load profiles for each year of the planning horizon. ~~The~~The electric utility sh all ensure the net system load forecast ~~shall be~~is consistent with the electric utility's forecasts of monthly energy and peak demands at the time of summer and winter system peaks for each customer class. 4. The utility shall provide all forecasts by scenario and customer class of: (1) customer counts and (2) average use per customer.	Sierra Club recommends that the required load forecasting methodology include provisions of all forecasts by scenario and customer class of: (1) customer counts and (2) average use per customer. This detailed information greatly improved the quality of evaluations of the load forecasts by permitting the disaggregation of different types of causes and effects.	Partially incorporated (see response for details)	Incorporated a requirement for the electric utility to describe and document forecasts of customer counts for each customer class in the base case load forecasts - 21.030(4)(D).2.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
191	Liberty-Empire	030	21.030(3)(K)1.	The utility should not be required to search for other forecasts developed by other entities in order to benchmark or validate.	This requirement seems onerous. This implies that we need to do a literature search for any other entities that have conducted load forecasts for the region. Additionally, contrasting service territory forecasts versus RTO, government agencies, or other high-level forecasts may produce a highly speculative analysis without the granular insight into how those forecasts were created. This step is overly burdensome and does not provide sufficient value given the work involved.	Partially incorporated (see response for details)	Revised the second part of 21.030(2)(J)1 to specify that benchmarking against independent forecast is intended as a check for reasonableness as part of the forecast validation process. The intent of this provision is not to require an exhaustive search for external forecasts, rather, where relevant independent forecasts are available, utilities should use them to help assess whether its forecast results are reasonable. The first part of the 21.030(2)(J)1-benchmarking against historical load patterns is good practice.
192	Midwest Energy Efficiency Alliance	030	21.030(3)2.	When the electric utility uses end-use determinants, the electric utility shall demonstrate that ~~appliance~~ measure saturation, efficiency trends, technology adoption, electrification, and customer behavior are explicitly represented in the model.	*As noted above*	Incorporated where requested	
193	Sierra Club	030	21.030(4)(A)	**Former IRP Rule 030 (4)(A) Original Text:** ~~The electric utility shall disaggregate its load forecasts into base load forecasts, representing expected energy consumption and system non-coincident peak absent each demand-side resource as identified in 20 CSR 4240 21.050. The electric utility shall separately provide forecasted demand and energy impacts for each demand-side resource, representing the expected load impacts of demand-side measures during the anticipated hours, seasons, and years, on reducing or shifting load.~~ **Sierra Club Suggestion for Revised Text:** The electric utility shall disaggregate its load forecasts into base load forecasts, representing expected energy consumption and system non-coincident peak absent each demand-side resource as identified in 20 CSR 4240 21.050. The electric utility shall separately provide forecasted demand and energy impacts for each demand-side resource, representing the expected load impacts of demand-side measures during the anticipated hours, seasons, and years, on reducing or shifting load.	Sierra Club recommends against striking. Presentation of load forecast both with and without demand-side measures is a common and important tool in understanding the assumptions used to construct the forecasts.	Not incorporated	This was originally deleted to avoid redundancy. The function is still present in the rule. 21.030(4)(A)2-3 has a requirement for the base case load forecast to incorporate the load impacts of implemented demand side programs and also to exclude the load impacts of proposed demand side programs.
194	Ameren Missouri	030	21.030(4)(C)	Insert "the electric utility shall" so it reads "The electric utility shall develop the base-case load..."	Clarifications for consistency of how this list is presented	Incorporated where requested	
195	Ameren Missouri	030	21.030(4)(D)1.	Insert "Describe and document" so it reads "Describe and document forecasts of the hourly load profile..."	Follows from prior edit - using applicable verbs	Incorporated where requested	
196	Ameren Missouri	030	21.030(4)(D)10.	Insert "Explain" so it reads "Explain how the base-case load..."	The list in (D) are things the utility is supposed to do so using appropriate verb	Incorporated where requested	
197	Ameren Missouri	030	21.030(4)(D)2.	Strike "based on a minimum of twenty (20) years of historical data" and insert "Describe and document" so it reads "Describe and document forecasts of monthly and annual energy consumption..."	Forecast analyst should have discretion to pick the amount of data to use in the model. There may be very good analytical reasons not to use 20 years.	Incorporated where requested	
198	Ameren Missouri	030	21.030(4)(D)3.	Strike "based on a minimum of twenty (20) years of historical data" and insert "Describe and document" so it reads "Describe and document forecasts of monthly peak demand for each customer class..."	Forecast analyst should have discretion to pick the amount of data to use in the model. There may be very good analytical reasons not to use 20 years.	Incorporated where requested	
199	Ameren Missouri	030	21.030(4)(D)4.	Insert "Explain" so it reads "Explain how the forecast..."	The list in (D) are things the utility is supposed to do so using appropriate verb	Incorporated where requested	
200	Ameren Missouri	030	21.030(4)(D)5.	Insert "Explain" so it reads "Explain how the forecast..."; strike "including" and insert "which may include, but are not limited to" or delete "real price of competitive energy sources"	The list in (D) are things the utility is supposed to do so using appropriate verb' also, the real price of competitive energy sources simply should not be expected to have a statistically significant relationship and needs to be excluded from the list or else the list should be a may versus shall list.	Partially incorporated (see response for details)	Modified the language to insert "Explain" but did not delete real price of competitive energy sources. This is language from the existing rule CSR 240-22.030(7)(A)1. and real prices of competing energy sources can impact demand
201	Ameren Missouri	030	21.030(4)(D)6.	Insert "Provide" so it reads "Provide estimates of the monthly cooling..."	The list in (D) are things the utility is supposed to do so using appropriate verb	Incorporated with modifications (see response for details)	Language has been revised to retain 'document'. See new definition of 'document', which clarifies that it means the provision of supporting information.
202	Ameren Missouri	030	21.030(4)(D)8.	Insert "Provide" so it reads "Provide graphical plots..."	The list in (D) are things the utility is supposed to do so using appropriate verb	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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203	Ameren Missouri	030	21.030(4)(D)9.	Strike "Describe the models and methods used to develop independent variable forecasts, including the rationale for model selection, the functional form of the models, and any judgmental adjustments applied."	Independent variable forecasts often come from third party consultants or entities like EIA, or are simple calculations like normal weather. I'm not sure of any independent variable where the utility forecasted it, or even has direct access to the models or methods used to forecast it.	Incorporated where requested	
204	Ameren Missouri	030	21.030(4)(D)9.	Insert "Explain" so it reads "Explain how the forecast is consistent..."	The list in (D) are things the utility is supposed to do so using appropriate verb	Incorporated where requested	
205	OPC	030	21.030(5)(A)	The electric utility shall prepare and file a base-case load forecast representing the electric utility's best estimate of future system load under a reasonable scenario, using the most probable median values, generally those representing a fifty percentile (50%) probability, for each independent variable contained in the forecast model and based on the electric utility's native forecast adjusted for existing and separately identified existing large load.	Similar to the changes that the OPC suggests for the definition of "base-case load forecast," the OPC suggests this change to maintain consistency in this subsection. Alternatively, if the Commission would like to refer to "most probable," the OPC suggests changing the reference to "a fifty percentile (50%)" to something higher.	Partially incorporated (see response for details)	Addressed in the definitions section. Redundant language was removed from this section to avoid duplication
206	Ameren Missouri	030	21.030(5)(B)1.	Add "and RTO" after "Utility" and add et end "; and/or have been submitted to the RTO for additional study"	For clarity to align with the actual process	Incorporated where requested	
207	Ameren Missouri	030	21.030(5)(B)2.	Edit so item reads: "Construction Agreement Phase. Large load projects in this phase have executed relevant construction agreements and made any required payments, but have not yet executed an electric service agreement;"	To reflect next sequence in process; study results come back and then once scope generally known move to construction agreement phase	Incorporated where requested	
208	Ameren Missouri	030	21.030(5)(B)3.	Add "completed steps 1 and 2 and" between "have" and "executed" and strike "interconnection agreement..." to end	To reflect next sequence; stricken items already covered in 1 and 2	Incorporated where requested	
209	Ameren Missouri	030	21.030(5)(B)4.	Strike "energization" and substitute "permanent service date"	More accurate descriptor of start of ramp period under ESAs	Not incorporated	Energization is a clearer descriptor.
210	Liberty-Empire	030	21.030(5)(D)(1) through (3)	The number of years for historical years to be used should not be prescriptive.	These sections dictate the number of historical years to be used. While longer historical data series are useful, they are not always applicable to the forecast problem. There needs to be language to allow for shorter periods of time if needed.	Incorporated where requested	
211	CGA	030	21.030(5)(D)11.	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 loads at the Execution Phase.	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.	Partially incorporated (see response for details)	Incorporated the bolded language (disaggregated by maturity level).
212	Sierra Club	030	21.030(6)	**Sierra Club Suggestion for Revised Text:** Identification of Large Load ~~Drivers.~~ Database ~~(A) The electric utility shall provide a list of committed large loads within that electric utility's service territory that would be eligible for service under the electric utility's large load tarig approved in accordance with section 393.130.7., RSMo. The information provided shall include at a minimum:~~ (A) The electric utility shall collect and maintain a large load database of existing, past proposed, and newly proposed large loads consisting of: 1. Anonymized project identifier; 2. ~~The customer's~~Large load project's industry type; ~~3. The~~Large load project's anticipated service location; ~~4.~~3. ~~The expected load shape (daily, seasonal, and annual);~~ and ~~5. The anticipated peak and annual energy requirements including when the electric utility expects contracted load to appear or change over the implementation plan period~~ 4. Large load metrics defined in 20 CSR 4240-21.015(50). (B) The electric utility shall categorize the maturity of large load projects by the following phases: 1. Utility study phase. Large load projects in this phase have submitted any required information, preliminary agreements, and deposits in compliance with the electric utility's approved tarigs and business practices; 2. RTO study phase. Large load projects in this phase have been submitted to the RTO for additional study; 3. Execution phase. Large load projects in this phase have executed an electric service agreement, interconnection agreement, and posted any required security or deposits; 4. Initial project energization. Large load projects in this phase receive retail electric service but have not reached full forecast peak load; and 5. Load ramping complete. Large load projects in this phase have reached full forecast peak load.	Sierra Club recommends that this description of a large load database includes language clarifying that the database should include existing, past, and newly proposed large loads. This information will help put proposed loads into context and create a useful database of all large loads.	Incorporated with modifications (see response for details)	Includes a requirement for the electric utility to provide a database consisting of the large load project's status

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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213	Liberty-Empire	030	21.030(6) and (7)	Large load prospects change with time and vary by utility. Large load forecasts should not be prescriptive.	The different levels of large interconnections mean additional scenarios. We should be careful about how many mandated scenarios we will be required to run. How do these large load scenarios work with Section (9) Sensitivity Analysis and Scenario Development?	Not incorporated	It is well documented that the pace and scale of large load growth is uncertain. Scenario-driven forecasting is appropriate given the consequences involved in under or overbuilding. The proposed rule requires only 3 large load scenarios (low, medium, high) unless otherwise ordered by the Commission or chosen by the electric utility.
214	Ameren Missouri	030	21.030(6)(B)	Strike "and document" so it reads "...shall describe how large load forecasts..."	It is not possible to document something that didn't happen, e.g., if a plane doesn't fly from point a to point B, we can't document the flight that did not exist	Incorporated where requested	
215	CGA	030	21.030(6)(B)	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.	Partially incorporated (see response for details)	Included "site control".
216	Ameren Missouri	030	21.030(6)(D)2.	Strike "and document" and "non speculative" so it reads "Describe the methodology, data sources, and assumptions..."	Not an analysis to document; By the nature of forecasting, judgment has to be used and non-speculative suggests that it cannot be used, which is incorrect - it has to be.	Incorporated with modifications (see response for details)	Adjusted language to reflect updated definitions and struck "non-speculative information".
217	Ameren Missouri	030	21.030(6)(D)3.A. through C.	Check references	References appear incorrect	Incorporated where requested	
218	Ameren Missouri	030	21.030(6)5.	Strike "and document" so it reads "Describe how large loads..."	Not an analysis	Incorporated with modifications (see response for details)	Adjusted language to reflect updated definitions.
219	Ameren Missouri	030	21.030(6)6.	Strike "and document" and "and identify the statistical methods employed to normalize historical loads," and "humidity, and" so that it reads "Describe how the forecast incorporates..."	Not an analysis - it's a description, an explanation	Partially incorporated (see response for details)	Adjusted language to reflect updated definitions.
220	Sierra Club	030	21.030(7)(A)	**Original Text:** The electric utility shall ~~prepare~~ describe and ~~file~~ document distinct forecasts ~~of potential~~ representing large load customer scen arios that are reasonably anticipated to materially affect the system load shape or resource needs for the planning horizon. **Sierra Club Suggestion for Revised Text: "Reasonably anticipated," including only loads that are contractually bound by signed electric service agreements to take service (i.e., phases 3, 4, and 5 as outlined in IRP Rule 030 (6)).**	General Comment: Sierra Club recommends that the Commission define "reasonably anticipated" and not leave it open to the utilities to define. "Reasonably anticipated" leaves too much latitude for interpretation. Sierra Club recommends the following definition for "reasonably anticipated": including only loads that are contractually bound by signed electric service agreements to take service (i.e., phases 3, 4, and 5 as outlined in IRP Rule 030 (6)).	Not incorporated	Care should be taken in adding "reasonably" into rule language, however, in this instance the language gives flexibility for stakeholders to discuss during pre-IRP process and for modeling relevant scenarios.
221	Ameren Missouri	030	21.030(7)(B)2.		while we appreciate the changes made to eliminate the requirements around performing rate impact analyses by rate class, we believe there may have been an oversight in the editing process around that point. In 030(7)(B)2, the requirement to perform the analysis "for each rate class" was struck, but the rule provision still refers to using allocation factors from the CCOS study in the conduct of this provision. We believe this is an oversight and hope that the allocation factor reference will also be struck from this rule provision.	Incorporated where requested	
222	Ameren Missouri	030	21.030(7)(B)2.	Strike "for each rate class based upon the most recently proposed class cost of service allocation"	This is the resource planning rule and no one would or should make a different resource decision based on hypothetical class impacts that will be based on Commission determinations in every rate case. Including this implies it has something to do with resource planning - and it doesn't - and an allocation from a prior case is meaningless as to how allocations may happen over the coming 16 years	Partially incorporated (see response for details)	Changed "annual rate impact by class" to "revenue requirement by year".
223	Evergy, Inc.	030	21.030(7)(B)2.	2. A comparison of revenue requirement by year ~~based upon the most recently proposed class cost of service allocation~~ for the resource plan(s) with and without the load-building program;	Evergy notes that subsection (7)(B)(2) states that the analysis should include "a comparison of revenue requirement by year based upon the most recently proposed class cost of service allocation for the resource plan(s) with and without the load-building programs." However, this language appears inconsistent with other portions of the rules, as all other references to class-specific rate impact analysis have been removed from the proposed rules in this draft. Evergy proposes to strike the reference "based upon the most "recently proposed class cost of service allocation.""	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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224	CGA	030	21.030(7)(D)3.A. and (7)(D)3.B. and (7)(D)3.C.	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 each of the High, Medium, and Low Probability Scenarios.	See previous comment per CGA's requested change to rule 21.030 (6)(B), above.	Partially incorporated (see response for details)	Included "site control". Utilities may not know the status of their customer's local and state permitting status.
225	Evergy, Inc.	030	21.030(7)(D)6.	~~6. Describe and document how the forecast incorporates weather variables and other variables that impact load, including normal conditions, extreme events, and identify the statistical methods employed to normalize historical loads, and the sensitivity of load to key weather variables such as temperature, humidity, and degree-days.~~	Consistent with its above comment concerning weather variability requirements, Evergy recommends striking this requirement. Section 393.1900 RSMo does not compel granular descriptions of weather variables in forecasting. The rule should not exceed the statute's level of specificity and should not impose overly prescriptive requirements.	Not incorporated	Weather is a key driver of hourly electric load, so it is important that forecasting models reflect how load responds to variables such as temperature and degree-days. Requiring electric utilities to explain this relationship helps ensure forecasts are reasonable and transparent.
226	Ameren Missouri	030	21.030(8)(A)1.	Insert "which may include" so it reads "...variables, which may include, but are not limited to..."	Not all of these would necessarily be key variables in all cases	Not incorporated	Changing the word to 'may include' would make the entire list optional. To ensure a transparent forecast, the independent variables listed should be provided.
227	Ameren Missouri, Evergy, Inc., and Liberty-Empire	030	21.030(8)(B)	Strike " For each scenario, the electric utility shall provide a load forecast for each of the distribution substations affected by the overall load growth. The electric utility shall describe and document the methodology used to forecast the distribution substation load, and should include a discussion of historical load growth within the geographical area served by each distribution substation, as well as any known changes, such as customer additions, in the geographic area served by each distribution substation."	A methodology is not an analysis; and, this would involved hundreds of substations – completely burdensome for no benefit.	Incorporated in a different location (see response for details)	Load forecasting for distribution system planning moved to 040 and refined based on discussions with utilities on current practices.
228	Evergy, Inc.	030	21.030(9)(A)1.	1. The electric utility shall describe and document its analysis of the sensitivity of the dependent variables of the base-case forecast to variations in the independent variables identified in subsection 4 CSR 4240-21.030(2)(3). ~~quantify the sensitivity of its base-case load forecast to changes in key independent variables, including, but not limited to, economic growth, electricity prices, customer adoption of new technologies, energy efficiency improvements, and electrification of end uses. For each sensitivity, the electric utility shall isolate the impact of a single driver, with results expressed as percentage changes in non-coincident peak and energy consumption relative to the base-case load forecast.~~	Given the new rule does not appear to meaningfully differ from the initial draft, Evergy reiterates its original comments. The rule, even as amended, exceeds requirements of Section 393.1900. Evergy also reiterates that elasticities for end-use adoption and efficiency are not consistent with the Statistically Adjusted End-use framework because it employs structured variables that are a build-up of both saturation and efficiency of end-use estimates. An estimation equation with load as an output and all individual end-use saturation and end-use efficiency as independent variables would suffer from a high degree of multi-collinearity, making elasticity results unreliable.	Incorporated where requested	
229	Evergy, Inc.	030	21.030(9)(B)	~~(B) For each scenario, the electric utility shall provide a load forecast for each of the distribution substations affected by the overall load growth. The electric utility shall describe and document the methodology used to forecast the distribution substation load, and should include a discussion of historical load growth within the geographical area served by each distribution substation, as well as any known changes, such as customer additions, in the geographic area served by each distribution substation.~~	Evergy maintains its original recommendation to strike this paragraph. Providing this level of detail for distribution substation load, including historical load growth and known changes, would be overly burdensome and falls outside of energy forecasting. Also, such details are not required by Section 393.1900 RSMo. For purposes of generation resource planning, supply side and demand side, distribution substation load is not used in that process. The distribution load is non- coincident and serves to evaluate the ability of the distribution assets to serve the local load. In aggregate, peak loads for distribution substations would be much higher than the total company coincident load for which resource planning is performed.	Incorporated in a different location (see response for details)	Load forecasting for distribution system planning moved to 040 and refined based on discussions with utilities on current practices.
230	Liberty-Empire	030	21.030(9)(B)	The IRP rule should not require substation level load forecasts.	This requires substation level forecasts. This is something we do not currently perform. To incorporate substation level forecasts would be significantly more expensive. The cost and complexity significantly outweigh any perceived benefits.	Incorporated in a different location (see response for details)	Load forecasting for distribution system planning moved to 040 and refined based on discussions with utilities on current practices.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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231	**New Energy Economics**	**035**	21.035	For each supply-side resource option in a model RFP and competitive procurement, the electric utility shall identify whether the cost assumptions are based on generic estimates, vendor quotes, recent bids, executed contracts, RTO/ISO market information, independent evaluator or administrator reports, or other market-tested evidence. The utility shall explain any material differences between generic cost assumptions and market-tested cost information. Cost-Risk Reduction in supply-side resource analysis should require the following for all fuel-based resources, and at a minimum require: Natural gas resources: · For each proposed natural gas resource, the utility shall separately identify and evaluate capital cost, fixed and variable O&M cost, heat rate, expected capacity factor, fuel commodity cost, delivered gas cost, firm transportation cost, pipeline reservation cost, gas storage cost, balancing cost, backup fuel cost, hedging cost and limitations, fuel-delivery risk, gas-electric coordination risk, winter availability risk, environmental compliance risk, and customer exposure through fuel adjustment clauses or other cost-recovery mechanisms. · For any existing natural gas generation resource, the utility shall demonstrate that the resource remains reasonable and prudent after accounting for full delivered-fuel costs and after comparison with portfolios designed to reduce or avoid gas additions and avoided gas fuel consumption (and associated fuel price risk) through solar, wind, storage, demand-side resources, distributed energy resources, customer programs, transmission-enabled alternatives, market purchases, or bilateral contracts. Coal resources: For each coal-fired generating unit, the utility shall evaluate lifecycle economics over the planning horizon, including delivered coal fuel costs, coal transportation costs, coal contract terms, coal inventory and working capital, fixed O&M, variable O&M, capital maintenance, environmental compliance, ash management, water compliance, outage costs, forced outage rates, equivalent availability, capacity accreditation, expected capacity factor, market revenues or avoided purchases, decommissioning costs, remediation costs, remaining book value, retirement costs, and replacement costs. Coal capital spending: • The utility shall identify all planned capital expenditures, environmental compliance expenditures, major maintenance expenditures, and life-extension expenditures for each coal unit during the planning horizon. For any coal-unit expenditure above a materiality threshold, the utility shall compare the expenditure against retirement and replacement alternatives before including the expenditure in the preferred resource plan or implementation plan.	In the model RFP and competitive procurement, the supply-side analysis should rely on market-tested resource cost information wherever available. Generic cost assumptions may be useful for early screening, but they should not substitute for actual market evidence when major customer commitments are at stake. Supply-side analysis should evaluate the full cost and risk of fuel-based resources (e.g., natural gas, coal, fuel oil, hydrogen, nuclear, etc.). Generic capital and fuel assumptions are not enough. The rule should require full cost analysis for delivered fuel resources and lifecycle economics, especially for coal resources which tend to increase in cost as units age, are forced to remain in service, or both.	Not incorporated	As indicated in Comment Nos. 2, 10, 11, 90, 260, 285, 307, 407, 417, and 418, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included.
232	**CGA**	**035**	21.035(1)(A)	Amend item #6 thus: "Purchased power from bi-lateral transactions and from organized capacity and energy markets**, including from resources in the RTO generator interconnection queues that are likely to come online in the plan period."**	This language would ensure utilities are considering the full range of potential resources likely to be available over the course of the planning period.	Incorporated where requested	
233	**CGA**	**035**	21.035(1)(A)	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.	Incorporated in a different location (see response for details)	The language was modified and included in 21.035(2)(E)4.
234	**CGA**	**035**	21.035(1)(A)	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.	Not incorporated	21.035(1)(A)7. Includes transmission improvements which could include new assets.
235	**Google**	**035**	21.035(1)(A)	Provide flexibility regarding the size of new technologies.	Google Suggest revising the definition to include language that focuses on "commercially viable" technologies vs technologies that have reached a 10 MW deployment threshold. While Google recognizes the need for some cutoff, a 10 MW cutoff would limit newer technologies that could provide significant value, even if the operational pilot is less than 10 MW (e.g. small scale transmission/distribution resources that could support system reliability, or certain medium or long duration storage technologies).	Not incorporated	The 10 MW threshold change was made at the request of electric utilities who had concerns on it being left open ended. Storage and distributed generation are separately listed in subsection (1)(A).

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
236	Sierra Club	035	21.035(1)(A)	**Sierra Club Suggestion for Revised Text:** The electric utility shall identify and evaluate a variety of potential supply-side resource options for purposes of resource planning, which the electric utility can reasonably expect to use, develop, implement, or acquire. Potential supply-side resource options include but are not limited to: 1. Full or partial ownership of new plants using existing generation technologies; 2. Full or partial ownership of new plants using new generation technologies, including technologies expected to become commercially available within the planning horizon;, meaning an operational pilot of 10 MW or greater; 3. Renewable energy resources on the electric utility-side of the meter, including a wide variety of renewable generation technologies; 4. Technologies for distributed generation; 5. Technologies for storage, including various durations (4-hr, 8-hr, etc) as well as standalone and paired storage configurations; 6. Purchased power from bi-lateral transactions and from organized capacity and energy markets; 7. Upgrading of the transmission and distribution systems as identified in 20 CSR 4240-21.040; 8. Life extension and refurbishment of assets at existing generating plants, including but not limited to, mothballing; 9. Enhancement of the emission controls at existing generating plants; and 10. Generating plant efficiency improvements which reduce the electric utility's own use of energy.	Sierra Club recommends adding language on "technologies for storage" to specify the types of technologies that the electric utilities should consider, including different durations of storage (e.g., 4-hr, 8-hr, etc.) as well as both standalone and paired storage configurations. Paired storage systems, such as storage coupled with renewable generation, can provide additional operational and economic benefits by improving resource utilization, enhancing dispatchability, and increasing energy and capacity value. Since these storage technologies have distinct operating characteristics and performance capabilities, they should be considered separately as potential supply-side resource options.	Partially incorporated (see response for details)	Incorporated concept though modified language to "durations and configurations" to be more inclusive of potential technologies.
237	Ameren Missouri	035	21.035(1)(A)2.	Strike "meaning" and insert "(e.g., a technology for which" and "is currently in operation or advanced stages of development" so it reads "...planning horizon (e.g., a technology for which an operational pilot of 10 MW or greater is currently in operation or advanced stages of development);"	Should avoid absolute qualifications while indicating what could constitute such a technology.	Incorporated where requested	
238	Sierra Club	035	21.035(1)(B)	**Original Text:** In identifying and evaluating potential supply-side resources, the electric utility shall describe and document its existing supply-side resources including but not limited to: 1. Unit characteristics; 2. Current and expected accredited capacity by season; 3. Licensing status; 4. Current depreciation rates for each generating unit; 5. Currently expected retirement dates; and 6. If applicable, any remaining useful life of each generating unit.	General Comment: Sierra Club recommends adding a requirement to conduct robust retirement analyses that evaluate a range of retirement timing options for existing resources, including opportunities for retirement. Analyses should not exclusively rely on pre-determined retirement dates and should assess individual generating units separately where feasible. Modeling both with fixed retirement dates and permitting optimized retirement is important for a full understanding of potential resource retirement outcomes. This recommendation would provide greater transparency into the costs, benefits, and system impacts of retirement options for individual resources.	Not incorporated	Specific language was not proposed. See also 035(2)(B)1 and 060(2)(F)3.
239	Sierra Club	035	21.035(1)(C)	**Original Text:** The electric utility shall describe and document its analysis including provision of cost and performance information sugicient to fairly analyze and compare each of these existing and potential supply-side resource options established in subsection (1)(A~~) of this rule,~~), including, but not limited to, those attributes needed to individually assess the following cost categories by resource: 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 characteristics and attributes. **Sierra Club Suggestion for Revised Text:** The electric utility shall describe and document its analysis including provision of cost and performance information sugicient to fairly analyze and compare each of these existing and potential supply-side resource options established in subsection (1)(A~~) of this rule,~~), including, but not limited to, those attributes needed to individually assess the following cost categories by resource: 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 operation and maintenance costs and variable operation and maintenance costs, reported separately; 3. Probable environmental compliance costs; and 4. Unit characteristics and attributes.	Fixed and variable operation and maintenance costs should be reported separately to improve transparency and support consistent evaluation of project economics, resource utilization, and cost-effectiveness across alternatives. To the extent the utility considers any fuel costs to be fixed, it should quantify fixed and variable fuel costs for the specific generating unit and should explain why certain fuel costs are considered fixed. As currently worded, utilities may instead choose to report combined fixed and variable operations and maintenance costs.	Incorporated with modifications (see response for details)	The language was modified to further specify what is to be reported separately.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
240	CGA	035	21.035(1)(D)	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 alternative approach when one source does not sufficiently cover all resources.	Not incorporated	At the in-person workshop, the electric utilities expressed concern about sending out RFPs too early to incorporate in an IRP process, then being stale by the time information is needed for submission to the RTO and CCN application. The electric utilities will still have to submit RFP information for any supply-side resource that is being implemented during the implementation period.
241	CGA	035	21.035(1)(D)	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.	Partially incorporated (see response for details)	Added transport/pipeline costs and commodity prices as a new item in (1)(D). Addressed fuel procurement costs in 21.060(2)(B)2.B.
242	Renew Missouri	035	21.035(1)(D)	(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 costcategories by resource. Information should be supported by a request for information, request for proposal, independent market benchmark, or comparable third-party data source.: 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 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.	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. 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 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.	Incorporated in a different location (see response for details)	Addressed fuel procurement costs in 21.060(2)(B)2.B.
243	Ameren Missouri	035	21.035(2)(B)1.	Insert "that may be subject to changes in configuration or operation during the planning horizon, including changes in environmental controls or retirement dates"	It should not be necessary to detail every unit for which no changes are to be evaluated since it would not have an effect on the relative performance of alternative resource plans.	Incorporated where requested	
244	CGA	035	21.035(2)(B)1.	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.	Incorporated in a different location (see response for details)	The information is already required as part of 035.(2)(C)1.
245	Ameren Missouri	035	21.035(2)(B)2.	Strike "probable"	This appears to be an artifact of the "probable environmental cost" language previously in this provision. If not, it's use here is not clear.	Incorporated with modifications (see response for details)	Struck "probable" but added "estimated".
246	CGA	035	21.035(2)(B)2.	Specify that "probable" costs include the following: capital, fixed and variable O&M, and fuel procurement costs (i.e., commodity prices and transport/pipeline reservation and storage costs).	See previous comments per our requested changes to rules 21.035 (1)(D) and (2)(B)(1), above.	Incorporated in a different location (see response for details)	This information is located elsewhere, would clutter a summary table.
247	CGA	035	21.035(2)(C)1.	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.	Incorporated in a different location (see response for details)	Information is located elsewhere, would clutter a summary table.
248	Renew Missouri	035	21.035(2)(C)1.	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 maintenance costs cost categories listed in 20 CSR 4240- 21.035 (1)(D) ;	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.	Incorporated in a different location (see response for details)	Addressed in rule 21.035(1)(D)

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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249	Ameren Missouri	035	21.035(2)(C)2.	Strike "Costs of ancillary and/or back up supply side resources required to achieve necessary reliability levels or assumed capacity accreditation level"	Reliability level cannot be estimated by looking at one or two resources together. It must be done at a portfolio level as part of the alternative resource plan analysis. Capacity accreditations are produced for each resource type individually and do not assume additional/back-up supply.	Partially incorporated (see response for details)	Some generation can be bid into the RTO/ISO as a hybrid resource. Struck "reliability".
250	Ameren Missouri	035	21.035(2)(C)3.	Strike "identify"	Leftover word.	Incorporated where requested	
251	Evergy, Inc.	035	21.035(2)(C)3.	3. A description of ~~potential~~ environmental legal mandates ~~which may be imposed at some point within the planning horizon~~, including: A. The probable environmental compliance costs of each potential supply-side resource option, which shall be quantified by estimating the cost to the electric utility to comply with such environmental legal mandates ~~that may be imposed~~; B. A list of environmental pollutants ~~for which legal mandates may be imposed during the planning horizon which would result in compliance costs that could significantly impact electric utility rates;~~ ~~C. A subjective probability that represents the utility's estimated likelihood that legal mandates requiring additional levels of mitigation will be imposed at some point within the planning horizon~~; and D. The electric utility's expected mitigation cost, based on these probabilities, for each identified pollutant.	Evergy reiterates its previous concerns with any requirement that the utility identify and structure analyses around merely "potential" environmental legal mandates. Laws and regulations often change materially during the drafting process, and attempting to calculate compliance costs for a draft law is inherently speculative; in many cases, no reasonable cost estimate can be developed when a law or rule is undergoing multiple revisions at the same time the utility is preparing its IRP filing. Furthermore, similar to Evergy's concerns regarding draft rule 21.020(2)(C)(4) discussed above, legal mandate that may take effect five to ten years in the future, for example, falls outside the Implementation Plan period and can be addressed, if necessary, at a later date. Evergy recommends striking language requiring analysis of the impacts based on speculative future laws. Evergy would not oppose a requirement that an IRP filing include a narrative discussion on potential future laws, rather than basing resource plan analysis on potential legal mandates.	Not incorporated	Parties may disagree on the precise policy, but the potential for a new policy should be considered. For example, inclusion of a carbon tax.
252	Evergy, Inc.	035	21.035(2)(C)3.	3. A listing of ~~identify potential~~ ~~environmental legal mandates~~ ~~which may be imposed at some point within the planning horizon, including:~~ A. The probable environmental compliance costs of each potential supply-side resource option, which shall be quantified by estimating the cost to the electric utility to comply with such environmental legal mandates ~~that may be imposed~~; B. A list of environmental pollutants ~~for which, in the judgment of the electric utility decision-makers, legal mandates may be imposed during the planning horizon which would result in compliance costs that could significantly impact electric utility rates~~; ~~C. A subjective probability that represents electric utility decision-maker's judgment of the likelihood that legal mandates requiring additional levels of mitigation will be imposed at some point within the planning horizon;~~ and ~~D. The electric utility's expected mitigation cost, based on these probabilities, for each identified pollutant.~~	Evergy reiterates its recommendations regarding the requirements that the utility identify and structure analyses around "potential" environmental legal mandates. Laws and regulations often change materially during the drafting process, and attempting to calculate compliance costs for a draft law is inherently speculative; in many cases, no reasonable cost estimate can be developed when a law or rule is undergoing multiple revisions at the same time the utility is preparing its IRP filing. Evergy recommends striking language requiring analysis of the impacts based on speculative future laws. Evergy would not oppose a requirement that an IRP filing include a narrative discussion on potential future laws, rather than basing resource plan analysis on potential legal mandates.	Not incorporated	Parties may disagree on the precise policy, but the potential for a new policy should be considered. For example, inclusion of a carbon tax.
253	Sierra Club	035	21.035(2)(C)3.C.	**Original Text:** ~~The electric utility shall specify a~~ A subjective probability that represents electric utility decision-maker's judgment of the likelihood that legal mandates requiring additional levels of mitigation will be imposed at some point within the planning horizon. ; and	General Comment: Sierra Club recommends that the Commission provide specific guidance here to assure that state goals and mandates are achieved and to achieve consistency across utilities.	Not incorporated	The electric utility needs to provide this information.
254	Ameren Missouri	035	21.035(2)(E)	Strike "the" and insert "its analysis reflects a" and "that" so it reads "...The electric utility shall ensure that its analysis reflects a transmission network that is capable..."	The focus should be on the adequacy of the transmission network representation included in the analysis.	Incorporated where requested	
255	Renew Missouri	035	21.035(2)(E)4.	Improvements, **including grid enhancing technologies**, on the electric utility's transmission and distribution system to increase efficiency **and/or capacity** and reduce power losses;	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.	Incorporated where requested	
256	Liberty-Empire	035	21.035(3)(D)	Clarification of interconnection costs and any other transmission requirements.	In the Supply-Side Resource Analysis section, it states that the electric utility shall include the cost of interconnection and any other transmission requirements, in addition to the electric utility cost and probable environmental compliance cost, in the cost of supply-side candidate resource options advanced for purposes of developing the alternative resource plans. The Company agrees that a proxy for transmission and other costs are important to consider, but it is important to emphasize that most candidate resources evaluated within the IRP process are generic resources. The cost of interconnection, for example, would most likely not be known at the time of the IRP evaluation. It seems like the proposed rule should make some consideration for this and mention an "estimate" of costs that are to be considered.	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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257	Sierra Club	035	21.035(3)(E)	**Sierra Club Suggestion for Revised Text:** The electric utility shall develop, ~~and~~ describe and document, ranges of values and probabilities for several important uncertain factors related to supply-side candidate resource options. These cost estimates shall include, at ~~least~~ a minimum, the following elements and key inputs, as applicable to the supply-side candidate resource option: 1. Fuel price forecasts, including fuel delivery costs and pipeline interconnection costs if applicable, over the planning horizon for the appropriate type and grade of primary fuel and for any alternative fuel that may be practical as a contingency option; 2. Estimated capital costs including engineering design, construction, testing, startup, and certification of new facilities or major upgrades, refurbishment, or rehabilitation of existing facilities; 3. Estimated annual fixed operation and maintenance costs and variable operation and maintenance costs, provided separately, over the planning horizon for new facilities or for existing facilities that are being upgraded, refurbished, or rehabilitated; 4. Forecasts of the annual cost or value of emission allowances to be used or produced by each generating facility over the planning horizon, if applicable; 5. Annual fixed charges for any facility to be included in the rate base, or annual payment schedule for leased or rented facilities; and 6. Estimated costs of interconnection or other transmission requirements associated with each supply-side candidate resource option.; 7. Estimated compliance costs associated with potential federal environmental regulations that could impact each supply-side candidate resource option; and 8. Additional inputs critical to cost estimation including expected capacity factors and required capacity credits.	Compliance obligations imposed by federal environmental regulations could impact costs associated with certain supply-side resources. Sierra Club recommends adding an additional item to the numbered list requiring electric utilities to identify and provide a list of potential federal environmental regulations that could impact these resources as well as quantify the associated compliance costs. Key inputs and assumptions used for cost estimation should be provided along with cost estimates to enable stakeholders to evaluate the basis for the estimates, assess their reasonableness, and compare	Incorporated in a different location (see response for details)	Proposed edits to "3." partially included into 21.035(1)(D)2. Proposed language for "7" was not incorporated as the 035 draft contemplates probable environmental costs and potential risks and constraints. Proposed language for "8" was not incorporated as "capacity credit" is unclear. The draft requires provision of unit characteristics and accredited capacity.
258	Ameren Missouri	035	21.035(3)(F)	Strike "develop, describe and document ranges of values and probabilities for the factors related to" and "considered" and insert "consider" so it reads "The electric utility shall consider the impact of implementing alternative fuel options for supply…"	This should be considered as part of the development of the assumptions in (E) above rather than separately.	Incorporated with modifications (see response for details)	Added "impact of implementing alternative fuels" into 3 (E) from 3 (F), then deleted 3 (F).
259	Sierra Club	035	21.035(3)(F)	**Original Text:** The electric utility shall develop, describe and document, ranges of values and probabilities for the factors related to the impact of implementing alternative fuel options considered for supply-side candidate resource options on the assumptions. **Revised Text:** The electric utility shall develop, describe and document, ranges of values and probabilities for the factors related to the impact of implementing alternative fuel options considered for supply-side candidate resource options on the assumptions as well as expected market supply and costs for these fuels in each modeled year.	Sierra Club recommends adding a requirement for submitting information about expected market supply and costs for these fuels in each modeled year.	Not incorporated	This is already covered with "…ranges of values and probabilities…"
260	New Energy Economics	040	21.040	For any model RFP or procurement plan, the electric utility shall describe how transmission costs, interconnection costs, deliverability, congestion, firm transmission service, grid enhancing technologies, advanced conductors, surplus interconnection service, and transmission enabled alternatives will be evaluated and compared across resource bids and portfolios. To best ensure cost-risk reduction: · The utility shall evaluate transmission, distribution, interconnection, grid enhancing technologies, advanced conductors, surplus interconnection service, and transmission-enabled alternatives as potential cost-risk-reduction tools. · The utility shall identify whether transmission or distribution alternatives could reduce fuel-price exposure, purchased power exposure, congestion costs, curtailment, generation capital spending, or the need for new fossil fuel commitments.	Transmission should not be treated only as a cost assigned to utility-selected generation. Transmission can also be a resource alternative that reduces congestion, improves deliverability, accesses lower-cost resources, or avoids unnecessary generation investment. The model RFP should explain how transmission and interconnection costs will be assigned and compared across bids. Further, transmission and distribution investments should not be treated only as costs assigned to other resources. Transmission, grid enhancing technologies, interconnection upgrades, and distribution investments may reduce fuel risk, reduce congestion, improve deliverability, or defer more expensive generation.	Not incorporated	As indicated in Comment Nos. 2, 10, 11, 90, 231, 285, 307, 407, 417, and 418, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included.
261	Ameren Missouri	040	21.040(1)(A)	Strike "and reasonably" so it reads "The electric utility shall describe the adequacy of…"	These are not analyses - this is information	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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262	Evergy, Inc.	040	21.040(1)(A)	(1) Transmission Analysis Requirements. ~~(A) The electric utility shall describe and document the adequacy of its existing transmission system including:~~ ~~1. Age, condition, and efficiency level of its existing transmission system; and~~ ~~2. All known transmission constraints due to real power, reactive power, and power quality under current peak demand.~~	Evergy maintains its opposition to these Transmission Analysis Requirements under subsection (A) and recommends striking them. Requiring the Company to describe and document the adequacy of its existing transmission and distribution systems as this would be unduly burdensome and is vague. The transmission and distribution system comprises hundreds of thousands of assets at different agencies and conditions. Evergy also remains unclear what is meant by "efficiency level" in this context or what is meant by "transmission constraints" or "distribution constraints" and the updated draft rules do not provide clarification. Additionally, these requirements are not required by Section 393.1900 RSMo. The statute requires a utility to analyze potential new transmission and distribution options and costs associated with transmission or distribution infrastructure required to integrate proposed investments into the system. But these requirements can be met without the burdensome regulatory requirements of this proposed rule.	Partially incorporated (see response for details)	Removed the word "document", simplified the transmission constraint language, and added "if known".
263	CGA	040	21.040(1)(A)2.	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.	Not incorporated	Congestion goes towards the efficiency of the system, which is covered in 21.040(1)(A)1.
264	Ameren Missouri	040	21.040(1)(B)	Strike "and reasonably document" and insert "using" so it reads "the electric utility shall describe the adequacy of its existing transmission system with any projects anticipated to be completed under, using at a minimum..."	Same comment - "using" is missing	Incorporated where requested	
265	Ameren Missouri	040	21.040(1)(C)	Insert "reasonably" so it reads "...describe and reasonably document..."	Consistent with other uses of document (where applicable) above; without qualifier, provision is limitless and burdensome	Partially incorporated (see response for details)	Modified language consistent with the separation of "describe and document" into separate categories.
266	CGA	040	21.040(1)(C)	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.	Not incorporated	Various types of transmission upgrades should be considered, not just those that alleviate congestion.
267	Evergy, Inc.	040	21.040(1)(E) through (G)	~~(E) The electric utility shall estimate the portion and amount of costs and revenues of proposed regional transmission upgrades that would be allocated to the electric utility over the implementation period.~~ ~~(F) The electric utility shall estimate the amount of revenue requirement of regional transmission assets that would be allocated based on load to the electric utility .~~ ~~(G) The electric utility shall provide a report for consideration pursuant to 20 CSR 4240-21.035(1)(D) that identifies the physical transmission upgrades needed to interconnect generation, facilitate power purchases and sales, and otherwise maintain a viable, reliable, and/or resilient transmission network, including:~~ ~~1. A list of the transmission upgrades needed to physically interconnect a generation source within the appropriate RTO/ISO footprint;~~ ~~2. A list of the transmission upgrades needed to enhance deliverability from a point of delivery within the appropriate RTO/ISO including requirements for firm transmission service from the point of delivery to the electric utility's load and requirements for financial transmission rights from a point of delivery within the appropriate RTO/ISO to the electric utility's load;~~ ~~3. A list of transmission upgrades needed to physically interconnect a generation source located outside the appropriate RTO/ISO footprint;~~ ~~4. A list of the transmission upgrades needed to enhance deliverability from a generator located outside the appropriate RTO/ISO footprint, including requirements for firm transmission service to a point of delivery within the appropriate RTO/ISO footprint and requirements for financial transmission rights to a point of delivery within the appropriate RTO/ISO footprint;~~ ~~5. The estimated total cost of each transmission upgrade; and~~ ~~6. The estimated fraction of the total cost and amount of each transmission upgrade allocated to the electric utility.~~	Evergy maintains its original recommendations to strike the Transmission Analysis Requirements reflected in subsections (E) through (G). Evergy reiterates that it is unclear whether the Company can estimate revenues of transmission upgrades as required by subsection (E). Subsection (F)'s requirement to estimate the amount of revenue requirement of regional assets is outside the scope of resources planning and is more appropriate for consideration in a rate case. Regarding the overly prescriptive requirements of subsection (G), all these costs would be identified by SPP through their Generation Interconnection process and would be heavily reliant upon the specific location of the resource.	Incorporated with modifications (see response for details)	Existing IRP rules require much of the proposed stricken language. However, current draft reflects notable revisions to address concerns. These include: a utility may rely on the relevant RTO/ISO for its rev. req. estimate; eliminated much of the prescriptive detail in (G) and clarified use; outlined expectations around utility assessment of RTO/ISO expansion plan in new (H).
268	Ameren Missouri	040	21.040(1)(F)	Insert "under the respective ISO/RTO tariff" so it reads " The electric utility shall estimate the amount of revenue requirement of regional transmission assets that would be allocated under the respective ISO/RTO tariff based on load to the electric utility ."	Regionally allocated projects are assessed at the MISO level, by MISO. AMMO projects assessed and planned as part of 1(B) are not available for regional allocation	Incorporated where requested	
269	Ameren Missouri	040	21.040(1)(G)	Strike "report" and insert "analysis" so it reads "...shall provide an analysis for consideration..."	Appears to call for an analysis not a report as such	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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270	Midwest Energy Efficiency Alliance	040	21.040(1)(G)	Add point #7: 7. A discussion of alternatives to transmission upgrades that were considered, such as advanced transmission technologies or non-wires solutions that could defer or delay the need for transmission upgrades. Add definitions to **20 CSR 4240-21.015:** "Advanced transmission technologies" means hardware and software solutions that can be used to improve and enhance the transmission system, including dynamic line rating, topology optimization, power flow controllers, advanced conductors, and other technologies. "Non-wires solutions" means deploying DSM and DER resources in specific geographic locations to avoid investment in transmission or distribution system upgrades.	We would like to see the utilities discuss in this report the alternatives they explored in addition to capital investment in transmission upgrades, whether or not they were adopted. The definition of advanced transmission technologies is based on the US Department of Energy. The definition of non-wires solutions comes from Chapter 13 of the 2026 edition of the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources (NSPM).	Incorporated in a different location (see response for details)	Concepts here generally covered under 21.040(3)
271	Ameren Missouri	040	21.040(1)(G)6.	Strike "The estimated fraction of the total cost and amount of each transmission upgrade allocated to the electric utility".	Cost allocation is done at RTO level	Incorporated where requested	
272	Ameren Missouri	040	21.040(1)(H)	Insert " The electric utility may use the ISO/RTO transmission expansion plan or its equivalent to satisfy the provisions of this Section (1) in whole or in part if all the following conditions are satisfied: 1. The electric utility actively participates in the development of the plan; and 2. The electric utility reviews the ISO/RTOs overall expansion plans each year to assess whether the plans, in the judgment of the electric utility decisionmakers, are in the best interest of Missouri customers.		Not incorporated	The RTO/ISO plan is a complement to the electric utility's transmission system and not a complete substitute. However, notable revisions were made. See responsive comment 267.
273	Ameren Missouri	040	21.040(2)(A)	Strike "the" and insert" If needed to inform preparation of the IRP filing, the" and "reasonably" so it reads" If needed to inform preparation of the IRP filing, the electric utility shall describe and reasonably document the adequacy of its existing distribution system including:"	May be unnecessary to develop ARPs and PRP; documentation requirements should be reasonable not absolute per other language included in the draft rule	Incorporated where requested	
274	Evergy, Inc.	040	21.040(2)(A)	~~(A) The electric utility shall describe and document the adequacy of its existing distribution system including: 1. Age, condition, and efficiency level of its existing distribution system; and~~ ~~2. All known distribution constraints, including constraints due to real power, reactive power, and power quality, under current peak demand; and~~ ~~3. All known distribution constraints, including constraints due to real power, reactive power, and power quality, under reasonably anticipated additions to peak demand.~~	Evergy maintains its original recommendation to strike these requirements. The Company does not maintain "all known" real power, reactive power, and power quality constraints under both current and future peak demand. As Evergy does not track information in this form, creating and maintaining such a dataset solely for this rule would be resource-intensive. Further, these requirements do not impact generation development activities.	Partially incorporated (see response for details)	Modified language of (2)(A)2. to add "If needed to inform preparation of the IRP filing,"
275	Ameren Missouri	040	21.040(2)(B)	Distribution load forecasting scenario analysis in 040.(2)(B). This currently requires a "describe and document", which suggests a potentially expansive analysis. We believe that the key here is to focus the rule on the simplest form of analysis or discussion that helps understand why the base case distribution capital plan is meaningful and appropriate, relative to a high (or low) load forecast. Developing a detailed quantitative distribution capital plan for a high (or low) load forecast, that must be filed consistent with 025, is a potentially significant body of work.		Partially incorporated (see response for details)	Definition of "describe and document" changed, removed language to tie directly to the load forecast rule, and made stress test optional.
276	Ameren Missouri	040	21.040(2)(B)	Strike " The electric utility shall describe and document the adequacy of its existing distribution system under, at a minimum, the following scenarios: High-growth scenario load forecast at year five (5) pursuant to 20 CSR 4240-21.030(8)(A)3.A.; Low-growth scenario load forecast at year five (5) pursuant to 20 CSR 4240-21.030(8)(A)3.A.; and A scenario the electric utility selects to stress-test its distribution system."	In contrast to transmission planning (and relevant ISO/RTO requirements), utilities do not have the ability to do this now at this level of detail and it would be extremely burdensome and costly to do so. Moreover, if the system was adequate for all that, there would be no need to continue planning and construction.	Partially incorporated (see response for details)	Struck language that tied scenarios to the 21.030, made the stress-test scenario optional.
277	Sierra Club	040	21.040(2)(D)	**Original Text:** The electric utility shall develop and provide a hosting capacity map to identify areas on its distribution system that may be suitable for distributed energy resources. **Sierra Club Suggestion for Revised Text:** The electric utility shall develop and provide a hosting capacity map to identify areas on its distribution system that may be suitable for distributed energy resources, **as well as information regarding feeders at or near capacity that might need upgrades given new load from electrification or other reasons.**	Sierra Club recommends adding a requirement for submitting information regarding feeders at or near capacity that might need upgrades given new load from electrification or other reasons.	Incorporated with modifications (see response for details)	Added "provide general understanding..."
278	Evergy, Inc.	040	21.040(3)	(3) Advanced transmission and distribution network technologies. (A) The electric utility shall assess advanced transmission and distribution technologies that may become available during the planning horizon and facilitate or expand the availability and cost effectiveness of demand-side resources or supply-side resources. ~~(B) The cost benefit analysis of advanced transmission and distribution technologies shall be separately identifiable in the analyses required in section (1) and section (2) and include:~~ ~~1. A description of the electric utility's efforts at incorporating advanced grid technologies into its transmission and distribution networks; and~~ ~~2. A description of the impact of the implementation of transmission and distribution advanced grid technologies on the selection of a resource acquisition strategy.~~	Evergy recommends striking this subsection concerning cost benefit analysis of advanced transmission and distribution technologies. Existing regulations, including 20 CSR 4240-22.045, already address a utility's evaluation of such technologies and should not be duplicated or expanded here. Any requirement to assess advanced technologies should remain consistent with the analytical framework set forth in existing regulations.	Not incorporated	This proposed rule is intended to eventually replace Chapter 22. Therefore the analysis, which is part of Chapter 22 (and was already simplified in the draft for comment version), should be included in some form in Chapter 21. Replaced "cost-benefit analysis" terminology to address utility concerns.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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279	CGA	040	21.040(3)(A)	Add the bolded phrase to the end of this requirement to assess ATTs: "including where on the electric utility's transmission and distribution systems these technologies might alleviate congestion."	CGA wholly supports this requirement, but recommends this item also require the utility to show where on its system these ATTs would be potentially beneficial, rather than simply assess their availability and cost-effectiveness in a vacuum.	Not incorporated	This should already be provided as part of the cost benefit analysis.
280	CGA	040	21.040(3)(B)	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.	Not incorporated	Modified language in 21.040(1) and 21.040(3)(B), however, utility assessment in (3)(B) could encompass this consideration.
281	Ameren Missouri	040	21.040(4)	Strike "Such analysis must provide time periods identified as well as magnitudes necessary to avoid or minimize necessary transmission and distribution system upgrades"	It is not possible or necessary in the IRP to be at this level of detail. The analysis would also need to consider the timing, magnitude and the LOCATION of all DSM deployment to answer this. That can not be completed in a CEM (nor should it)	Not incorporated	The MEEIA statute requires demand side resources to be valued equally to traditional investments in supply and delivery infrastructure. Having an avoided cost of demand-side resources determined outside the IRP inherently treats supply-side investments differently than demand-side investments. However, language was added to limit requirements to utilities with MEEIA programs or plans for MEEIA programs.
282	Evergy, Inc.	040	21.040(4)	~~(4) The electric utility shall develop, describe and document an avoided transmission capacity cost and an avoided distribution capacity cost based upon investments in transmission assets or distribution assets that can be reasonably avoided due to implementation of demand-side management programs. Such analysis must provide time periods identified as well as magnitudes necessary to avoid or minimize necessary transmission and distribution system upgrades. The avoided transmission and distribution capacity costs are components of the avoided demand cost pursuant to 20 CSR 4240-21.050(1)(A)2.~~	Evergy maintains its original recommendation to strike this subsection, as it is overly burdensome. Evergy plans infrastructure investments based on historical load, expected load growth, and incorporated demand-side management programs. Carving out DMS impacts to quantify avoided costs is overly burdensome.	Partially incorporated (see response for details)	The MEEIA statute requires demand side resources to be valued equally to traditional investments in supply and delivery infrastructure. Having an avoided cost of demand-side resources determined outside the IRP inherently treats supply-side investments differently than demand-side investments. However, language was added to limit requirements to utilities with MEEIA programs or plans for MEEIA programs.
283	Ameren Missouri	040	21.040(6)	(1) Strike " Affiliate relationships. (A) If any affiliate of the electric utility intends to build transmission within the electric utility's service territory where the project(s) are partially- or fully-driven by economic considerations, then the electric utility shall explain why such affiliate-built transmission is in the best interest of the electric utility's Missouri customers and the electric utility shall describe and document the analysis performed to determine whether such affiliate-built transmission is in the best interest of the electric utility's Missouri customers. (B) The electric utility shall identify and describe any affiliate or other relationship with transmission planning, designing, engineering, building, and/or construction management companies that the electric utility impacts or may impact. Any description and documentation in section (1), section (2), section (4), and section (5), also apply to any affiliate transmission planning, designing, engineering, building, and/or construction management company or other transmission planning, designing, engineering, building, and/or construction management company currently participating in transmission works or transmission projects for and/or with the electric utility."	Provision is unnecessary. For Ameren Missouri, an adjustment is already made if an affiliate builds transmission in Ameren Missouri's service territory. If an issue arose Commission could order study of it coming out of IRP proceeding.	Not incorporated	For Ameren Missouri, the affiliate adjustment is made due to a stipulation and agreement that could be modified in future cases and may not apply to other utilities.
284	Liberty-Empire	040	21.040(6)	Move to Load Forecasting rule	This is confusing to have in the T& D rule, different teams do T&D and Forecasting	Not incorporated	The goal of this provision is to provide the Commission insight into the utility's planning actions for the adequacy and reliability of the distribution system, more specifically, the loading of substations on the system. Modifications, based on conversations with the utilities, were made to focus on substations that are at risk under current and/or future loads, rather than a full spatial load forecast. This will allow the electric utilities to better assess future distribution projects, and as such, it fits better in T&D rather than load forecasting.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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285	**New Energy Economics**	**050**	21.050	The model RFP and procurement plan shall identify how demand-side resources, including energy efficiency, demand response, load flexibility, dynamic rates, managed electric vehicle charging, and other customer programs, may compete individually or in portfolios to meet all or part of an identified resource need. The utility shall evaluate energy efficiency, demand response, load flexibility, dynamic rates, managed electric vehicle charging, and other demand-side resources as resources capable of reducing fuel-cost exposure, purchased-power exposure, large-load cost risk, and the need for new supply-side resources.	Demand-side resources should be allowed to compete to meet identified resource needs where they can provide comparable capacity, energy, reliability, flexibility, or cost-reduction value. They should not be treated only as separate programs outside the procurement process. For addressing cost risk, Demand-side resources can reduce customer cost risk by lowering peak demand, reducing fuel use, avoiding market purchases, and deferring generation, transmission, and distribution investments. They should be evaluated as resources that can reduce fuel and market exposure.	Not incorporated	As indicated in Comment Nos. 2, 10, 11, 90, 231, 260, 307, 407, 417, and 418, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included.
286	**Ameren Missouri**	**050**	21.050(1)	1. Strike " 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, transmission, or distribution investments that can be reduced, deferred, or avoided as a result of demand-side program implementation." and insert "	Strike for inconsistency.	Not incorporated	The IRP drafting team does not believe these items are inconsistent/conflict and therefore have not incorporated the suggestions.
287	**Ameren Missouri**	**050**	21.050(1)	1. Add "Avoided costs from the immediately prior quadrennial IRP filing (or triennial, if applicable) may be used to satisfy Sections 3(B) and 3(C) in this chapter, for the purposes of developing different combinations of demand-side resources as candidate options in the analysis for the IRP filing in question."	Avoided costs defined in definitions and see section (4) below. Addition 2 (regarding AC from prior IRP) added to create clarity to the timing sequence of avoided costs and to speak to the intent of developing different "tranches" of DSM; statement is necessary to help define the timing and purpose of the Potential Study used to screen in different combinations of DSM resources.	Not incorporated	Under this proposed modification, avoided costs would never be updated from the last Chapter 22 IRP filing. Having an avoided cost of demand-side resources determined outside the IRP inherently treats supply-side investments differently than demand-side investments.
288	**Renew Missouri**	**050**	21.050(1)	(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 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, transmission, or distribution investments that can be reduced, deferred, or avoided as a result of demand-side program implementation. (B) The electric utility shall model Missouri Energy Efficiency Investment Act (MEEIA) demand-side resource options separately from non-MEEIA demand-side resource options. (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 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 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. **(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 weatherization or efficiency programs, such as LIHEAP, LIWAP.**	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.	Not incorporated	This information may be addressed under paragraph (D) under "other relevant factors."

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
289	Evergy, Inc.	050	21.050(1)(A)	(A) In order to properly optimize the amount of demand-side resources, the electric utility shall designate all Missouri jurisdictional demand-side resources as 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 for use in 20 CSR 4240-20.092, ~~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~~ the utility avoided demand cost shall include the capacity cost of generation, transmission, and distribution facilities, adjusted to reflect reliability reserve margins and capacity losses on the transmission and distribution systems, or the corresponding market-based equivalents of those costs. The utility shall describe and document how it developed its avoided demand cost. 2. ~~The electric utility's avoided demand cost calculation shall specify generation, transmission, or distribution investments that can be reduced, deferred, or avoided as a result of demand-side program implementation.~~ The utility avoided energy cost shall include the fuel costs, emission allowance costs, and other variable operation and maintenance costs of generation facilities, adjusted to reflect energy losses on the transmission and distribution systems, or the corresponding market-based equivalents of those costs. The utility shall describe and document how it developed its avoided energy cost.	Evergy continues to have concerns with this proposed rule. Evergy reiterates its prior recommendation to replace the avoided-cost language in subsection (1)(A) with language in the current IRP rules, namely 20 CSR 4240 22.050(5)(A)1. & 2. As Evergy previously explained, the proposed avoided-cost methodology does not reflect how avoided costs are actually used in the integrated resource planning process. Avoided costs are not an output of IRP modeling; rather, they are an input estimate used to screen DSM measures and programs for potential inclusion in a DSM portfolio and are needed approximately 12 months before the IRP process even begins. A model-based approach does not produce this until the end of the IRP process. Furthermore, the proposed requirement to restrict the analysis to "the first four years" would artificially drive avoided cost to zero. DSM delivers value over the full planning horizon. DSM portfolios ramp gradually and provide cumulative benefits over 15–20 years. Restricting avoided cost to early years understates that value. Moreover, the proposed requirement that the utility identify specific generation, transmission, or distribution investments that can be reduced, deferred, or avoided is not compatible with how DSM portfolios function in practice. DSM resources are typically deployed incrementally over time, often building gradually over a 15- to 20-year period, and therefore do not lend themselves to identification with a discrete supply-side asset coming online at a specific moment. Moreover, because the assumptions and inputs in each IRP change from one filing to the next, the type and timing of hypothetical supply side resources also change, making any such identification highly variable and creating a level of precision that does not meaningfully exist.	Not incorporated	The MEEIA statute requires demand side resources to be valued equally to traditional investments in supply and delivery infrastructure. Having an avoided cost of demand-side resources determined outside the IRP inherently treats supply side investments differently than demand-side investments. Consistent with current practice, initial screening for demand-side resources happens in market research studies, customer surveys, test marketing programs, and other activities (see 21.050(3)(C)7). Nothing in the current language prohibits the consideration of the benefits of demand-side programs implemented in the first four years beyond those first four years. Recent MEEIA program practice has been to award an earnings opportunity based on a deferred supply-side resource.
290	Evergy, Inc.	050	21.050(1)(A)	(A) In order to properly optimize the amount of demand-side resources, the electric utility shall designate all Missouri jurisdictional demand-side resources as 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~~ the utility avoided demand cost shall include the capacity cost of generation, transmission, and distribution facilities, adjusted to reflect reliability reserve margins and capacity losses on the transmission and distribution systems, or the corresponding market-based equivalents of those costs. The utility shall describe and document how it developed its avoided demand cost. 2. ~~The electric utility's avoided demand cost calculation shall identify specific generation, transmission, or distribution investments that can be reduced, deferred, or avoided as a result of demand-side program implementation~~ The utility avoided energy cost shall include the fuel costs, emission allowance costs, and other variable operation and maintenance costs of generation facilities, adjusted to reflect energy losses on the transmission and distribution systems, or the corresponding market-based equivalents of those costs. The utility shall describe and document how it developed its avoided energy cost.	Evergy reiterates its original recommendation to replace the avoided-cost language in subsection (1)(A) with language in the current IRP rules, namely 20 CSR 4240-22.050(5)(A)1. & 2. The proposed avoided-cost methodology does not reflect how avoided costs are actually used in the integrated resource planning process. Avoided costs are not an output of IRP modeling; rather, they are an input estimate used to screen DSM measures and programs for potential inclusion in a DSM portfolio and are needed approximately 12 months before the IRP process even begins. A model-based approach does not produce this until the end of the IRP process. Furthermore, the proposed requirement to restrict the analysis to "the first four years" would artificially drive avoided cost to zero. DSM delivers value over the full planning horizon. DSM portfolios ramp gradually and provide cumulative benefits over 15–20 years. Restricting avoided cost to early years understates that value. Moreover, the proposed requirement that the utility identify specific generation, transmission, or distribution investments that can be reduced, deferred, or avoided is not compatible with how DSM portfolios function in practice. DSM resources are typically deployed incrementally over time, often building gradually over a 15- to 20-year period, and therefore do not lend themselves to identification with a discrete supply-side asset coming online at a specific moment. Moreover, because the assumptions and inputs in each IRP change from one filing to the next, the type and timing of hypothetical supply-side resources also change, making any such identification highly variable and creating a level of precision that does not meaningfully exist.	Not incorporated	The MEEIA statute requires demand side resources to be valued equally to traditional investments in supply and delivery infrastructure. Having an avoided cost of demand side resources determined outside the IRP inherently treats supply side investments differently than demand side investments. Consistent with current practice, initial screening for demand-side resources happens in market research studies, customer surveys, test marketing programs, and other activities (see 21.050(3)(C)7). Nothing in the current language prohibits the consideration of the benefits of demand-side programs implemented in the first four years beyond those first four years. Recent MEEIA program practice has been to award an earnings opportunity based on a deferred supply side resource.
291	Evergy, Inc.	050	21.050(1)(C)	(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 4240-21.055 analysis as a demand-side resource.~~	Evergy also reiterates its original recommendation to strike the requirement to exclude distributed energy resources ("DERs") as demand-side resources. This provision is inconsistent with the statutory definition of "demand-side program" in Section 393.1075, RSMo. The statute expressly includes any program conducted by the utility to modify net consumption of electricity on the retail customer's side of the meter, including but not limited to energy efficiency, load management, demand response, and interruptible or curtailable load. By definition, DER, particularly behind-the-meter technologies such as energy storage, solar, and electric vehicles, can and do modify net customer consumption and serve as load management tools.	Not incorporated	The goal here is to not double count DER resources. Given the analysis contemplated in 21.055 this provision must remain to avoid double counting.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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292	Ameren Missouri	050	21.050(1)(D)	Strike " 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 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."	Striking because this appears unnecessary and there is no understanding of what it is trying to do	Not incorporated	Determination of baseline conditions and appliance saturation is inherent in understanding the net-to-gross factors of any demand-side program, and thus the overall benefit/cost of the program.
293	Evergy, Inc.	050	21.050(1)(D)	(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 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.~~	Evergy also reiterates its original recommendation to strike the requirement to describing and document assumptions concerning changes in baseline conditions. Changes in baseline conditions driven by customers or consumers outside of utility-sponsored programs do not relate to the evaluation or design of demand-side programs. Rather, they relate to the development of the underlying load forecast. The proposed requirement introduces load-forecasting concepts into a section intended to govern utility-sponsored demand-side resources. To the extent the Commission intends for such factors to be captured in the development of baseline load assumptions, that work is more appropriately addressed within the load forecasting framework. Including this language in the demand-side resource section creates confusion about scope, risks duplicative analysis, and blurs the distinction between baseline load development and evaluation of utility-sponsored demand-side programs.	Not incorporated	Determination of baseline conditions and appliance saturation is inherent in understanding the net-to-gross factors of any demand-side program, and thus the overall benefit/cost of the program.
294	Midwest Energy Efficiency Alliance	050	21.050(1)(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~~ measure saturations, employment growth, federal standards, building codes, and other relevant factors. The electric utility shall provide an estimate of all 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.	As noted above	Incorporated where requested	
295	Ameren Missouri	050	21.050(2)(A)	Strike " (2) Non-MEEIA Demand-Side Resources. 1. 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 demand-side resource consists of a demand-side program designed to deliver one (1) or more energy efficiency measures, or energy management measures, including demand response programs. For each demand side resource, the electric utility shall provide: 1. The targeted class of customers; (B) A list of proposed measures, if applicable; 1. Expected life of the measure and duration of impact; 2. All major end uses, including the end uses which are to be considered in the electric utility's load pursuant to 20 CSR 4240- 21.030; 2. An itemized list of all expected costs of the program for each year of the planning horizon, including, but not limited to, incentives, administration, and evaluation by year; and 3. An estimate of the rate impacts to each customer class by year that includes and identifies an assumption of the timing of the electric utility's general rate cases. (C)The electric utility shall provide all documentation, including any prior evaluations, to substantiate the assumptions in subsection (3)(A). (C)The electric utility shall identify and provide details concerning all demand response programs registered with the electric utility's appropriate regional transmission organization or independent system operator."	Whether a utility seeks to file a MEEIA application for a given DSM program (or not) has no implication for resource planning - if the utility has a DR program, or has an EE program – and they impact capacity or energy needs – that is what is relevant to resource planning not whether the program is part of a MEEIA approved plan - See edit in (3) (which becomes (2)) below	Not incorporated	MEEIA statute provides incentives to utilities to support the policy of valuing demand side investments equal to traditional investments in supply and delivery infrastructure. These incentives also impact the rates customers pay.
296	Ameren Missouri	050	21.050(2)(C)7.	Insert " The electric utility shall report the total resource cost test as a measure of system-wide economic efficiency; the electric utility shall also report the participant cost test and utility cost test to assess the impact to participants and non- participants, respectively."	The appropriate way to understand participant and non-participant impacts is via the participant cost test and utility cost test. These Standard Practice Manual tests create consistency in evaluation across utilities and within the demand side industry.	Not incorporated	TRC requires avoided cost to calculate which the electric utilities had expressed concern about producing prior to the preferred resource plan selection. Deleted the requirement for the TRC but kept the avoided cost definition.
297	Ameren Missouri	050	21.050(2)(C)7.	Strike " An estimate of the rate impacts to each customer class, and separately for program participants and non-participants in each customer class, by year, that includes and identifies an assumption of the timing of the electric utility's general rate cases, inclusion of the electric utility's proposed earnings opportunity, and Demand-Side Investment Mechanism rate cases."	See earlier comment on lack of proper role of this metric in resource planning	Partially incorporated (see response for details)	Removed "customer class" impacts. Maintained participant/non-participant impacts for rate impact consideration.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
298	Evergy, Inc.	050	21.050(3)(A)	(A)The electric utility shall conduct, describe, and document market research studies, customer surveys, test marketing programs, and other activities as necessary to estimate ~~the maximum achievable potential, technical potential, and realistic achievable potential of each demand-side resource option.~~	Evergy recommends striking the references to "maximum achievable potential," "technical potential," and "realistic achievable potential" in this requirement, as specifying particular potential metrics is unnecessary to support reasonable estimation and evaluation of demand-side resource options. Instead, the rule should simply require the utility to conduct and document appropriate research and analysis to estimate demand-side resource options, without prescribing specific potential frameworks.	Incorporated with modifications (see response for details)	The language was edited to "The electric utility shall conduct market research studies, customer surveys, test marketing programs, and other activities as necessary to estimate the potential impacts of demand-side resource options; and describe and document the results."
299	Renew Missouri	050	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 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.** The electric utility may compile existing data or adopt data developed by other entities, including government agencies and other utilities, as long as the electric utility verifies the applicability of the adopted data to its service territory;	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.	Incorporated with modifications (see response for details)	The language in (B)1. was modified for clarity and some of the recommended language was included in (B)2.
300	Midwest Energy Efficiency Alliance	050	21.050(3)(C)	A potential MEEIA demand-side resource consists of a demand-side program designed to ~~modify~~ reduce or temporally shift the net consumption of electricity on the retail customer's side of the electric meter, including but not limited to energy efficiency measures, rate management, demand response, and interruptible or curtailable load.	This provides language clarity of what modifying consumption means, and that it is inclusive of both load shedding and load shifting.	Not incorporated	Language is statutory and therefore cannot be modified.
301	Renew Missouri	050	21.050(3)(C)	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 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 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).	Not incorporated	"Shift" is not in the MEEIA statute. MEEIA states "...modify the net consumption of electricity on the retail customer's side of the electric meter."
302	Evergy, Inc.	050	21.050(3)(C)7.	7.An estimate of the rate impacts ~~to each customer class, and separately for program participants and non-participants in each customer class, by year that includes and identifies an assumption of the timing of the electric utility's general rate cases, inclusion of any electric utility's proposed earnings opportunity, and Demand-Side Investment Mechanism rate cases. The identified earnings opportunity shall be based on specific investments that can be reduced, deferred, or avoided as a result of demand-side program implementation.~~	Evergy maintains its original recommendation to strike the requirement to provide an estimate of rate impacts by customer class. IRP models do not have the granularity necessary to calculate program-level costs and benefits by customer class or by participation status, and such analyses are more appropriately addressed in a general rate case.393.1900.4 RSMo requires the Commission balance rate impacts generally in its report and order on a utility's IRP. Evergy's proposal to require an estimate of only the rate impacts by year better aligns the proposed rule with the statute.	Partially incorporated (see response for details)	Removed "customer class" impacts. Maintained participant/non-participant impacts for rate impact consideration.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
303	**Ameren Missouri**	**050**	21.050(4)	Add: (2) "The total resource cost test and electric utility cost test shall be used to evaluate the cost effectiveness of the potential demand-side programs. (A) For the total resource cost test, in each year of the planning horizon— 1. The costs of each potential demand-side program shall be calculated as the sum of all incremental costs of end-use measures that are implemented due to the program (including both electric utility and participant contributions) plus electric utility costs to administer, deliver, and evaluate each potential demand-side program; and 2. For purposes of this test, the costs of potential demand-side programs shall not include lost revenues or electric utility incentive payments to customers. (B) For the electric utility cost test, in each year of the planning horizon— 1. The costs of each potential demand-side program shall be calculated as the sum of all electric utility incentive payments plus electric utility costs to administer, deliver, and evaluate each potential demand-side program; 2. For purposes of this test, the costs of potential demand-side programs shall not include lost revenues; and 3. The costs shall include, but separately identify, the costs of any rate of return or incentive included in the electric utility's recovery of demand-side program costs. (C) The electric utility shall provide results of the total resource cost test and the electric utility cost test for each potential demand-side program evaluated pursuant to subsection (5)(A) and (B) of this rule, including a tabulation of the benefits (avoided costs), demand-side resource costs, and net benefits or costs. (D) If the electric utility calculates values for other tests to assist in the design of demand-side programs, the electric utility shall describe and document the tests and provide the results of those tests. (E) The electric utility shall describe and document how it performed the cost effectiveness assessments pursuant to section (4) of this rule, and shall describe and document its methods and its sources and quality of information. (F) The electric utility shall describe and document all differences in the treatment of energy and demand reductions associated with demand-side resources utilized in appropriate regional transmission organization or independent system operator forecasting and the assumptions utilized for the IRP filing."	IRP rule should maintain language on cost-effectiveness testing, consistent with the MEEIA statute. As described in the accompanying comments, cost effectiveness testing is a necessary step to developing appropriate bundles or tranches of DSM for inclusion within the IRP analysis.	Not incorporated	Language was deleted in response to the electric utilities' concerns about the timing of determining avoided cost and cost effectiveness in the IRP. Cost effectiveness can be determined in subsequent MEEIA filings, which state that "the electric utility shall use the integrated resource plan and risk analysis used in its most recently adopted preferred resource plan to calculate its avoided costs;"
304	**Ameren Missouri**	**050**	21.050(4)(B)	Suggest updating 4(B) to say "shall specify" instead of "specific" to match 1(A)1 and avoided cost definitions for greater consistency throughout.		Not incorporated	This recommendation would incorrectly change the intent of subsection (4)(B). Subsection (1)(A) asks for the identification of avoided supply-side things using capacity expansion for MEEIA purposes; while subsection (4)(B) quantifies the benefits.
305	**Ameren Missouri**	**050**	21.050(4)(B)	Strike "specific" and insert "the corresponding market-based equivalents of those costs"	Added for consistency with (C) . See also prior comments and the need to ensure that avoided cost calculations are logically consistent with 060 supply side considerations, which also include market purchases	Not incorporated	Capacity is distinct from energy. Offsetting a capacity market purchase, when available, is not prohibited, but would need to be identified.
306	**Ameren Missouri**	**055**	21.055(1)	In (1)(A), this could begin with "For those systems that have applied for interconnection to the Utility" to make it clear that this database only applies to DER/DERA that the utility has a reasonable expectation of visibility. And that (1)(B) include some language to make "reasonably necessary" or "reasonably appropriate" language to collect any missing data. Key here is to avoid an unnecessary and cost prohibitive exercise of tracking down every last residential customer with some type of battery or EV, particularly for systems added improperly or where property owners have changed since installation.	This represents the sole instance where we have increased our cost estimate. We've included a one-time cost to build and develop the reporting structure. We have included this primarily as a lower bound placeholder, to highlight the nature of the work. In reality, it may be much higher but is difficult to speculate at this time. We'd strongly recommend that this section include some type of qualifier, that helps focus the database on known DERs that will materially change the resource planning process.	Partially incorporated (see response for details)	Incorporated the interconnection clause, and also (1)(B) provides flexibility for unknown data.
307	**New Energy Economics**	**055**	21.055	The model RFP and procurement plan shall identify how distributed energy resources and distributed energy resource aggregations may participate in competitive procurement, including any aggregation rules, measurement and verification requirements, operational requirements, and compensation or contract structures. The utility shall evaluate distributed energy resources and DER aggregations, including customer-sited generation, storage, managed charging, flexible load, and aggregated demand response, as potential resources for reducing fuel-price risk, market-purchase risk, distribution cost risk, and large-load cost risk.	Distributed energy resources and DER aggregations should be eligible to participate in all-source procurement where they can meet a portion of the utility's identified need. This includes customer-sited generation, storage, aggregation, and other distributed resources. Distributed energy resources can reduce cost risk when they avoid or defer fuel, generation, transmission, distribution, or market-purchase costs. DERs should be evaluated not only as a reporting category, but also as resources that can reduce customer exposure.	Not incorporated	As indicated in Comment Nos. 2, 10, 11, 90, 231, 260, 285, 407, 417, and 418, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
308	Evergy, Inc.	055	21.055(1)	(1) Strike " Distributed Energy Resources (DER) Database. (A) The electric utility shall create, and update annually, a database of information on DER for purposes of evaluating current penetration and planning for future changes in the levels of DER. 1. The electric utility shall maintain the following information in the database: A. Existing DER and DER aggregation interconnected to the electric utility's distribution system regardless of ownership; B. Information characterizing the location according to Geographic Information System coordinates on the distribution circuits where DER are connected; C. Aggregated capacity of DER for each circuit and annual peak load of each circuit; D. Relevant interconnection standard and standby service requirements, as applicable, that specify DER performance capabilities; and E. Summaries of the electric utility's past DER Adoption Potential Studiess performed to comply with section (2) and the DER planning process evaluation under section(3).(B) To the extent that the electric utility is not in possession of all of the information required, the electric utility shall state which information it does not possess, the reason the information is not possessed, and how the electric utility plans to obtain the information for future IRP filings."	As Evergy indicated in prior comments, this requirement is unduly burdensome. It should also be noted that the utility does not control whether and to what extent DERs will continue to be available period-to-period.	Partially incorporated (see response for details)	Paired down and clarified the database list. Additionally, (1)(B) allows the electric utility flexibility to create the database for a later IRP filing.
309	Evergy, Inc.	055	21.055(1)	~~(1) Distributed Energy Resources (DER) Database.~~ ~~(A) The electric utility shall create, and update annually, a database of information on DER for purposes of evaluating current penetration and planning for future changes in the levels of DER.~~ ~~1. The electric utility shall maintain the following information in the database:~~ ~~A. Existing DER and DER aggregations interconnected to the electric utility's distribution system regardless of ownership;~~ ~~B. Information characterizing the location according to Geographic Information System coordinates on the distribution circuits where DER are connected;~~ ~~C. Aggregated capacity of DER for each circuit and annual peak load of each circuit;~~ ~~D. Relevant interconnection standard and standby service requirements, as applicable, that specify DER performance capabilities; and~~ ~~E. Summaries of the electric utility's past DER Adoption Potential Studies performed to comply with section (2) and the DER planning process evaluation under section (3).~~ ~~(B) To the extent that the electric utility is not in possession of all of the information required, the electric utility shall state which information it does not possess, the reason the information is not possessed, and how the electric utility plans to obtain the information for future IRP filings.~~	Evergy maintains its original recommendation to strike these requirements concerning DER database standards. The proposed rule remains overly burdensome. Evergy still estimates that the time to implement this database in the initial year would take 160 engineering hours, and that each following year, it would take 60 engineering hours to process and validate updates. Additionally, regarding subsection (1)(A)(1)(B), it is unclear what GIS points would need to be included. Currently, Evergy records have GIS coordinates based off a customer address, and not necessarily where the meter or DER asset is located.	Partially incorporated (see response for details)	Paired down and clarified the database list. Additionally, (1)(B) allows the electric utility flexibility to create the database for a later IRP filing.
310	Ameren Missouri	055	21.055(2)(E)	Strike " The electric utility shall provide a cost-benefit analysis of deployment of DER or DER aggregations as an alternative to traditional resources."	Not necessary, given edits above.	Incorporated where requested	
311	Evergy, Inc.	055	21.055(3)	~~(3) Evaluating DERs as part of the IRP Filing.~~ ~~(A) If not fully covered by the electric utility's DER Adoption Potential Study, the electric utility shall include in the IRP filing the methodologies used to develop low, medium, and high DER penetration scenarios separately for DERs the electric utility sponsors and those that are non-electric utility sponsored, including: 1. Subjective probabilities; 2. Adoption rates;~~ ~~3. Geographic deployment assumptions; 4. DER and DER aggregation load profiles; and~~ ~~5. Any other relevant assumptions factored into the DER penetration scenario.~~ ~~(B) The electric utility shall describe and document the evaluation of the DER penetration scenarios developed in subsection (3)(A) and integration of DER and DER aggregations onto the electric utility's distribution system.~~ ~~(C) The electric utility's evaluation shall consider system reliability, beneficial modification of customer energy consumption, potential need for additional distribution assets, and changes to supply-side resources additions.~~ ~~(D) The electric utility shall provide an estimate of the reduction or increase in transmission and distribution line losses as a result of DER deployment. The electric utility may focus its analysis on portions of its transmission and distribution systems based on factors including, but not limited to, the need for location-specific upgrades. (E) The electric utility shall provide a cost-benefit analysis of deployment of DER or DER aggregations as an alternative to traditional resources.~~	Evergy reiterates its original recommendation to strike these requirements concerning a DER evaluation and a DER potential study. Evaluating DERs as part of the IRP Filing, would be overly burdensome. Evergy lacks a DER adoption model. Developing one would cost approximately $300,000 to $400,000 and would need to be coordinated with the DSM potential study to prevent double-counting and ensure the assumptions are aligned.	Not incorporated	DER proliferation affects resource planning in multiple ways, ranging from load forecasting, distribution system assessment, and even to influencing the preferred plan. As such, updated penetration studies are needed in each IRP so this rule is necessary.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
312	Liberty-Empire	060	21.060(1)	Optimization models may not be able to converge with a solution with multiple performance measures.	The Alternative Resource Plan and Preferred Resource Plan Requirements section of the proposed rule discusses the Specification of Performance Measures used to determine the preferred resource plan. The existing rule specifies the use of the minimization of the present worth of long-run utility costs as the primary selection criterion in choosing the preferred resource plan, subject to other constraints. This is often referred to as the minimization of the net present value of revenue requirements (NPVRR). A primary selection criterion appears to be missing from the proposed rule. While flexibility in the selection process is important and we do agree with the introduction of the decision scorecard approach in the proposed rule which allows for the consideration of multiple factors, it seems that minimizing NPVRR is still a good planning practice. Further, models may need a single planning selection criterion in order to optimize plans. Models may not be able to evaluate multiple selection standards.	Not incorporated	It is correct that CEM can optimize only one variable, and utilities may select NPVRR if they choose. The additional performance measures remain necessary for the electric utilities and the commission to assess how an ARP performs across the ten balancing factors.
313	Ameren Missouri	060	21.060(1)(B)	Strike "(IRP) filings" so it reads "...analyzed in the electric utility's integrated resource plan."	For proper definitional use – see prior comments	Incorporated where requested	
314	Sierra Club	060	21.060(1)(B)	**Original Text:** All electric utility performance measures shall be transparent, reproducible, and provide an objective comparison of the alternative resource plans analyzed in the electric utility's integrated resource plan (IRP) filings. **Revised Text:** All electric utility performance measures shall be quantitative, transparent, reproducible, and provide an objective comparison of the alternative resource plans analyzed in the electric utility's integrated resource plan (IRP) filings.	Sierra Club recommends requiring that performance measures be quantitative to better facilitate unbiased comparison of resource plans.	Not incorporated	All of the performance measures in the rule are already quantitative, so no additional language is needed.
315	Ameren Missouri	060	21.060(1)(C)	Strike "Expected accredited capacity of each resource by season" and "planning" so it reads " Total portfolio reserve margin"	Reserve margin may be considered a reliability metric in addition to planning reserve margin being considered a reliability standard. Resource accreditations should be considered and treated as input values used in determining the reserve margin, not reliability metrics.	Incorporated where requested	
316	Midwest Energy Efficiency Alliance	060	21.060(1)(C) 2.C.	C. Annual rate impact, bill impacts for participants and non-participants in demand-side programs, and participation rates for all customers and low-income customers in demand-side programs;	These recommendations provide the full complementary analysis that should be conducted along with benefit-cost analysis to help regulators strike a balance between rate, bill, and participation impacts from DSM. The rate impact will be the same across the customer class, irrespective of whether a customer participates. Bill impact analysis will provide an explanation of the difference between participants and non-participants that does not come from rate impact analysis. Participation rates provide the understanding of what portion of the customer base is falling into each of those bill impact categories. A full discussion of rate, bill and participant impacts can be found in the Appendix B of the 2026 edition of the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources. (https://www.naseo.org/Data/Sites/1/media/tknaseo/nspm-main-2026-final.pdf)	Not incorporated	Rate impacts are required by statute. The suggested additions exceed what is needed for effective resource planning.
317	Ameren Missouri	060	21.060(1)(C)1.	Strike "including" and add "which may include but which are not limited to" at end of lead in to list A to D	Should allow flexibility in selecting appropriate metrics to account for new approaches and emphasis on the most important metrics.	Partially incorporated (see response for details)	'Not limited to' was added to indicate that the listed performance measures are the minimum required and not exhaustive. Accordingly, 'may' was not incorporated.
318	Liberty-Empire	060	21.060(1)(C)1.	Clarification on reliability metrics.	Are new reliability metrics such as LOLE and EUE suggested or required?	Not incorporated	To clarify, LOLE/EUE are required as a performance measure to evaluate the ARPs.
319	Midwest Energy Efficiency Alliance	060	21.060(1)(C)1.	Add point E: E. Expected demand-side resources expressed in megawatt-hours of energy per year and/or megawatts of capacity per year.	Adding a metric here for demand side resources emphasizes that they also contribute to the "adequacy, flexibility, and operational reliability" of the portfolio.	Not incorporated	Demand-side resources are already addressed in (1)(C)1.C. which makes the addition unnecessary.
320	Ameren Missouri	060	21.060(1)(C)2.	Strike "including but" and insert "which may include but which are" so it reads "Quantitative cost metrics, which may include but which are not limited to:"	Should allow flexibility in selecting appropriate metrics to account for new approaches and emphasis on the most important metrics.	Not incorporated	The current language provides flexibility to include additional performance measures, while the listed measures remain a minimum. The proposed revision would imply that some may be omitted, which is not the intent.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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321	Ameren Missouri	060	21.060(1)(C)2.	Strike " B. Demand side program costs and forecasted Missouri Energy Efficiency Investment Act (MEEIA) rates, if applicable; C. 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".	Re: DSM programs, Demand-side programs costs should be considered an input assumption for analysis, not a performance measure. If MEEIA rates means specific rates for things like throughput disincentive and program cost recovery, those are simply mechanisms for recovering some portion of the revenue requirement and must be determined through ratemaking processes. IRP analysis reflects the total revenue requirement already without regard to inefficiencies in cost recovery or mechanisms used to address them Re: rate impacts, This level of analysis is inappropriate and impractical for IRP analysis. Please see the Company's comments submitted May 7, 2026, pages 10-11 for a detailed discussion of this item.	Partially incorporated (see response for details)	The incentives provided under MEEIA result in different rate impacts for participants and non-participants. The rate class level analysis has been removed to address communicated concerns regarding its complexity and granularity. Overall rate impact information remains necessary to implement reference to rate impact in 393.1900.
322	Ameren Missouri	060	21.060(1)(C)2.	Add: " B. Levelized customer rates; C. Maximum single-year rate change;" to replace former B -D with D to become "Metrics that assess...."	Levelized rates provide a single value for an ARPP that can be used to assess the relative performance of ARPPs. Annual rate impacts over the planning horizon cannot be objectively compared between ARPPs. Future participation by customer across multiple demand-side programs cannot be objectively determined. These metrics provide concise values that can be used for plan comparison, including accounting for the time value of money in the case of levelized rates.	Not incorporated	The quantitative costs metrics listed are a combinations of factors that can be used to assess the potential rate impact, which is listed as one of the balancing factors in Section 393.1900.4(3), RSMo, for the commission to assess in deciding if the preferred resource plan is reasonable and prudent. These therefore cannot be replaced; however 21.060.(1)(C) 6. allows the electric utility to include any other metrics it "believes are appropriate for assessing the performance of the alternative resource plans."
323	Renew Missouri	060	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. 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 pur chases; and **(F) The electric utility shall describe and document the comparative cost of each resource portfolio, 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.**	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	Not incorporated	LCOE does not account for the value of electricity at the time it is produced. The rule already requires cost information that reflects system conditions, so the proposed additions are not necessary.
324	Ameren Missouri	060	21.060(1)(C)2.A.	Strike "Annual" and insert "Net present value" so it reads "Net present value of revenue requirements..."	The cost metric must account for all costs over the entire planning horizon and must account for the time value of money. Comparison of any number of years of annual revenue requirements across multiple plans (and then across multiple values of numerous critical uncertain factors) is unwieldy and does not convey useful information to decision makers or regulators. Of course the annual revenue requirements used to calculate NPVRR will be provided as part of the work papers to facilitate detailed review, but it should not be considered a performance measure.	Not incorporated	Annual revenue requirement is one factor that can be used to assess the potential rate impact, which is listed as one of the balancing factors in Section 393.1900.4(3), RSMo, for the commission to assess in deciding if the preferred resource plan is reasonable and prudent. It therefore cannot be replaced with net present value of revenue requirement. 21.060.(1)(C) 6. allows the electric utility to include any other metrics it "believes are appropriate for assessing the performance of the alternative resource plans."
325	Evergy, Inc.	060	21.060(1)(C)2.D.	(II) A listing of the economic and demographic assumptions associated with the base-case load forecast as specified in 20 CSR 4240-21.030(4); (C)(3)(C)(III)(b) ~~Estimated level of average retail rates by rate class for the first eight (8) years of the plan and the percentage of change from the prior year~~; 21.030(8)(B)(2) ~~A comparison of annual rates in each year of the planning horizon for each rate class based upon the most recently proposed class cost of service allocation for the resource plan(s) with and without the load-building program~~; 21.060 (1)(C)(2)(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;~~	Addressed in a general rate case, and should be stricken. Also, the details ostensibly in the "level of average retail rates by rate class . . . and the percentage of change from the prior year" are not built into Evergy's IRP analysis or financial forecasts. Acquiring this data would almost certainly increase costs and add unnecessary complexity. This recommendation applies equally to all other provisions in the draft rules that require consideration of rate classes or rate case issues, as discussed in Evergy's original comments.	Partially incorporated (see response for details)	The "by rate class" requirement has been removed to address concerns about rate case issues and complexity. Annual rate impacts remain as it is necessary.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
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326	Ameren Missouri	060	21.060(1)(C)3.	Strike "including but not limited to: A. Total debt to capital ratio; B. Funds From Operations (FFO) to Debt ratio; C. Debt to Earnings Before Interest, Taxes, Depreciation, and Amortization (EBITDA) ratio; and D. Any other credit metric indicative of the electric utility's ability to finance an alternative resource plan."	Each utility should apply the credit metrics relevant to the assessment of its own credit. While the metrics listed here may or may not be applicable to every utility today, they could change or be replaced over time.	Not incorporated	These credit metrics constitute the minimum needed for evaluation. Electric utilities may supplement them with other metrics relevant to their circumstances, but these must remain.
327	Evergy, Inc.	060	21.060(1)(C)3.	3. Current and forecasted annual financial or other credit metrics, not necessarily based on the electric utility's financial plan, that assess the electric utility's ability to finance and sustain the implementation of an alternative resource plan, ~~including but not limited to: A. Total debt-to-capital ratio; B. Funds From Operations (FFO)-to-Debt ratio; C. Debt-to-Earnings Before Interest, Taxes, Depreciation, and Amortization (EBITDA) ratio; and D. Any other credit metric indicative of the electric utility's ability to finance an alternative resource plan.~~	As the language in this rule is unchanged from the prior version, Evergy reiterates its previous recommendation to strike the prescriptive requirements in subparagraphs (A)-(D). Evergy continues to expect that meeting these requirements will be time-consuming and expensive. Importantly, Evergy does not currently have a full financial model with the IRP. Notably, if the model cannot be built in Microsoft Excel, Evergy would need to purchase necessary software, further increasing costs. Evergy's lack of a full financial model risks injecting suboptimal information into the IRP process. Furthermore, these proposed requirements do not appear to be required by Section 393.1900 RSMo. Rather 393.1900 RSMo reserves inquiry into financial and credit metrics to the limited CCN inquiry. The Commission should not go beyond what is required by the statute. Additionally, the Commission already receives notice of current credit ratings, thus calculating these metrics with these specific requirements would be duplicative and of little value. Furthermore, the reference to paragraph (1)(C)(3) appears again later in section 21.060, in subsection (5)(E)(6), which governs evaluation and selection of the preferred resource plan and states: "Include financial performance measures specified in paragraph (1)(C)(3) annually through year ten (10) of the planning horizon." Evergy notes that this repeated cross-reference underscores the significance of paragraph (1)(C)(3), and therefore any overly prescriptive or burdensome requirements in that provision will likewise carry forward into the preferred plan evaluation process.	Not incorporated	Financial ratios are required under the existing Chapter 22 rules and are necessary to evaluate a utility's ability to finance new resources under an alternative resource plan. The requirements have been substantially reduced from earlier drafts.
328	Evergy, Inc.	060	21.060(1)(C)3.	3. Current and forecasted annual financial or other credit metrics, not necessarily based on the electric utility's financial plan, that assess the electric utility's ability to finance and sustain the implementation of an alternative resource plan, including but not limited to: A. Total debt-to-capital ratio; B. Funds From Operations (FFO)-to-Debt ratio; C. Debt-to-Earnings Before Interest, Taxes, Depreciation, and Amortization (EBITDA) ratio; and D. Any other credit metric indicative of the electric utility's ability to finance an alternative resource plan.	Evergy maintains its original recommendation to strike the prescriptive requirements in subparagraphs (A)-(D). Evergy expects meeting these requirements, even though the updated proposed rules struck many of the prior requirements, to be time-consuming and expensive. Evergy does not currently have a full financial model with the IRP. Notably, if the model cannot be built in Excel, Evergy would need to purchase necessary software, further increasing costs. Furthermore, these proposed requirements do not appear to be required by Section 393.1900 RSMo. Rather 393.1900 RSMo reserves inquiry into financial and credit metrics to the limited CCN inquiry. Additionally, the Commission already receives notice of current credit ratings, thus calculating these metrics with these specific requirements would be duplicative and of little value.	Not incorporated	Financial ratios are required under the existing Chapter 22 rules and are necessary to evaluate a utility's ability to finance new resources under an alternative resource plan. The requirements have been substantially reduced from earlier drafts.
329	Ameren Missouri	060	21.060(1)(C)4.A.	Strike "by resource type and by year"	Probable environmental compliance costs are frequently measured at a portfolio level given the applicability of numerous regulations at the fleet level and the uncertainty of the nature of future regulations. Any mitigation costs for environmental regulations will necessarily be included in the assumptions for resource costs (e.g., SCR, FGD, etc…).	Not incorporated	Probable environmental compliance costs are often imposed at the unit level, resource specific, and time specific and these differences affect resource-planning assumptions and decisions. Retaining "by resource type and by year" is appropriate.
330	Ameren Missouri	060	21.060(1)(C)4.B.	Strike "by resource type and by year".	See above	Not incorporated	Probable policy costs, like Missouri RES, are very specific to year and resource type. Retaining "by resource type and by year" is appropriate.
331	Ameren Missouri	060	21.060(1)(C)4.C.	Strike "Annual and"	As with other performance measures, a single measure of emissions is necessary to facilitate alternative plan comparisons. Annual emissions forecasts resulting from modeling are included in work papers.	Not incorporated	Annual emissions is known and the requirement is to provide annual performance measures. Omitting annual emissions would be inconsistent.
332	CGA	060	21.060(2)(2)	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.	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
333	CGA	060	21.060(2)(3)(A)	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.	Not incorporated	While not explicitly stated, PPAs and BTAs can already be considered, specifying them is unnecessary.
334	Ameren Missouri	060	21.060(2)(A)	Insert "to the extent any share in that shortfall is not hedged" so it reads "...clearing requirements, to the extent any share in that shortfall is not hedged, applicable..."	Ameren Missouri currently has hedges against an LCR shortfall - Historical Unit Considerations and Zonal Deliverability Benefits - that mitigate its exposure to the LCR, which itself is not a stand-alone requirement but a measure that can affect the market clearing price of capacity.	Not incorporated	This applies only in MISO, and the current language allows Ameren to explain how its hedging practices mitigate the requirement.
335	Liberty-Empire	060	21.060(2)(A) and 21.060(3)(H)3. and 21.020 and 21.010(2)(C)1.	The Southwest Power Pool (SPP) does not use a local clearing requirement (LCR) capacity construct	A key component of the proposed IRP rule appears to be to meet the Local Clearing Requirements. As defined by the proposed IRP rule, the LCR is the minimum amount of capacity needed to ensure reliability within a specific local resource zone or reserve zone. It shall be calculated consistent with the appropriate RTO/ISO requirements. However, it is our understanding that MISO has this type of construct, and the Southwest Power Pool (SPP) does not. In other words, this would be an RTO/ISO requirement that does not exist for all utilities operating in the state, including Liberty. What are the LCR implications for SPP utilities?	Incorporated with modifications (see response for details)	Added "required by the appropriate RTO/ISO," which ensures the requirement applies only when the RTO/ISO has LCRs.
336	Ameren Missouri	060	21.060(2)(B)	Insert "to the extent that differences in large loads are not reflected in different ARP's or in contingency plans"	Need a way to distinguish between load changes that help to define a different plan/portfolio and those that can affect the performance of any/all plans/portfolios.	Incorporated with modifications (see response for details)	The language has been adjusted to make explicit whether large loads are included in the load forecast or incorporated into an ARP.
337	Sierra Club	060	21.060(2)(B)	**Original Text:** The electric utility shall identify, describe and document all uncertain factors, assumptions and risks that could materially affect the performance of alternative resource plans over the planning horizon. These shall include, but are not limited to— **Sierra Club Suggestion for Revised Text:** The electric utility shall identify, describe, ~~and~~ document, **and model** all uncertain factors, assumptions and risks that could materially affect the performance of alternative resource plans over the planning horizon. These shall include, but are not limited to—	Sierra Club recommends adding a requirement to "model" in addition to "identify, describe and document" all risks.	Not incorporated	Requiring utilities to model every uncertain factor would add unnecessary complexity and cost to the IRP process.
338	Renew Missouri	060	21.060(2)(B)2.B.	Costs and Financial Impacts: A. Future interest rate levels and other credit market conditions 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 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.	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 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).	Incorporated where requested	
339	Ameren Missouri	060	21.060(2)(B)2.F.	Strike "earnings opportunity, throughput disincentive,"	Throughput disincentive is irrelevant to IRP analysis since it is an artifact of inefficient cost recovery that is addressed through MEEIA. The utility revenue REQUIREMENT analysis does not reflect any lost recovery as a result of changes in sales due to demand side programs. The earnings opportunity, to the extent there is one, is determined through MEEIA cases and need not be considered an uncertain factor. These are distinguished from program marketing costs, which are an input to the IRP analysis and carry some level of uncertainty.	Incorporated where requested	
340	Ameren Missouri	060	21.060(2)(B)4. and 5.	Strike "4. Extreme weather" and "5. Economic downturn".	Re: extreme weather: This is better handled as part of load uncertainty. It may also, or alternatively, be handled as part of the determination of reliability requirements, including as part of the capacity balance. Should have flexibility to determine how best to address; re: economic downturn: Impossible to predict with any degree of accuracy. Long-term economic assumptions can't account for the timing and/or depth of such events or whether they occur at all. Basing planning decisions on any forecast for such events is impractical and ill-advised.	Not incorporated	Extreme weather and economic downturns are material uncertainties that should be considered in scenario analysis. Utilities may address these through load forecasting, and retaining them in the list ensures they are evaluated.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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Cmnt No.	Submitting Party	Rule	Section	Stakeholder Suggested Edit	Stakeholder Explanation/Discussion	Where Incorporated	IRP Drafting Team Response
341	Evergy, Inc.	060	21.060(2)(B)6.	~~6. Potential future changes in legal mandates;~~	Consistent with Evergy's prior comments, the Company maintains its original recommendation to strike requirements for analyzing "potential" future legal mandates, as such requirements are highly speculative.	Not incorporated	Potential future changes in legal mandates are a widely recognized planning uncertainty and should be considered in the IRP process.
342	Ameren Missouri	060	21.060(2)(C)	Add "and" and strike "and document" so that it reads "develop and describe alternative..."	An ARP is not an analysis	Incorporated where requested	
343	Renew Missouri	060	21.060(3)(B)(1)	1. Treat supply-side and demand-side resources on a logically 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.	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.	Partially incorporated (see response for details)	The economically equivalent basis requirement already captures equivalent treatment of costs, making further specification unnecessary. The suggested clarifications regarding data sources and assumptions have been integrated into the existing language.
344	CGA	060	21.060(3)(B)1.	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.	Incorporated with modifications (see response for details)	Added language ("... utilizing comparable data sources,..") to require consistency.
345	Liberty-Empire	060	21.060(3)(G)2.	Clarification on implication of requirement to optimize/build portfolios under each Critical Uncertain Factor.	Implies requirement to optimize/build portfolios under each Critical Uncertain Factor (CUF). If this is required, this is a substantial departure from current modeling approach. We currently optimize new portfolios only under base assumptions, and test CUFs for those portfolios through dispatch and financial model, but no new portfolios optimized/built specifically under CUFs.	Not incorporated	The purpose is to see what ARP results look like when they deviate from the base case results, giving a fuller picture of the available options.
346	Ameren Missouri	060	21.060(3)(H)	Strike "and document" and insert "describe"	No analysis here - just a qualitative evaluation	Incorporated where requested	
347	Sierra Club	060	21.060(3)(H)	**Sierra Club Suggestion for Revised Text:** The electric utility shall describe and document how it evaluated the adequacy of ~~its~~ the capacity expansion modeling by ~~covering~~ addressing— 1. How the electric utility uses its capacity expansion optimization software for the development of alternative resource plans; 2. How the model identifies least-cost resource combinations under binding operational and reliability constraints; 3. How reserve margin and local clearing requirements are enforced in the model and how it is consistent with enforcement by the appropriate RTO/ISO along with an explanation of the possible penalties and negative outcomes for not meeting those requirements; 4. Whether supply-side resource selection results are sensitive to fuel and technology cost assumptions; 5. The degree to which the model's capacity expansion logic is stable under multiple sensitivities; ~~and~~ 6. How candidate resources are screened, shortlisted, and represented in the optimization process. 7. Submit a complete list of any limits placed on resource adoption by the model such as availability limited to maximum or minimum amounts, or in a limited set of the modeled years, along with a justification each limit placed on resource adoption by the model.	Sierra Club recommends adding a requirement to submit: A complete list of any limits placed on resource adoption by the model, such as availability limited to maximum or minimum amounts, or in a limited set of the modeled years.	Incorporated with modifications (see response for details)	Concept included but simplified language.
348	Ameren Missouri	060	21.060(3)(H)3.	Strike "and local clearing requirements" so it reads "How reserve margins are enforced..."	The CEM is agnostic to where resources are located, so LCR has no relevance here.	Incorporated where requested	
349	Ameren Missouri	060	21.060(3)(I)	Strike "and document"	No analysis here - just a qualitative evaluation	Incorporated where requested	
350	Sierra Club	060	21.060(3)(K)	**Original Text:** The electric utility may utilize alternative modeling techniques in addition to the requirements in subsection (2)(~~E) of this rule G~~) to develop additional alternative resource plans	General Comment: Sierra Club recommends that consistency be examined between this language and subsection (G) in the same section. Subsection (G) requires capacity expansion modeling while subsection (K) allows for alternative techniques. Subsection (K) seems very broad and would allow little oversight.	Not incorporated	This provision allows utilities to develop models that are not generated through CEM. Models developed without CEM are subject to more extensive documentation requirements, which provides oversight.
351	CGA	060	21.060(3)(L)	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.	Not incorporated	Certain ARPs may be specified by the commission and thus would not be generated through CEM. This provision is needed to allow those plans to be evaluated.
352	Ameren Missouri	060	21.060(3)(L)4.B.	Insert "or portfolio"	Many mandates are portfolio-level mandates.	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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353	Ameren Missouri	060	21.060(3)(L)4.D.	Strike "An explanation of how the proposed resources satisfy the need; and "	Not necessary with the change to B.	Incorporated where requested	
354	Ameren Missouri	060	21.060(3)(L)5.A.	Strike "A citation for each applicable statute, administrative code, or regulatory or judicial order;"	If there is no legal mandate, this information does not exist.	Incorporated with modifications (see response for details)	Struck the existing language and replaced it with language better suited to situations involving non legal policy considerations.
355	Ameren Missouri	060	21.060(3)(L)5.B.	Insert "or portfolio" and strike "cited"		Incorporated where requested	
356	Ameren Missouri	060	21.060(3)(L)5.D.	Strike "An explanation of how the proposed resources satisfy the need".		Incorporated where requested	
357	Ameren Missouri	060	21.060(4)(A)	Strike "shall" and insert "may"	If all plans are carried into risk analysis, this step is not necessary. This provision seems to be included to provide the flexibility to pare down the set of plans for risk analysis, so it shouldn't be made a hard and fast requirement.	Not incorporated	The current language already provides flexibility to pare down the list while maintaining the electric utility's responsibility to address risk and uncertainty in its analysis.
358	Ameren Missouri	060	21.060(4)(B)2.B.	Strike "demonstrate", and "best" and insert "describe how" so it reads "The electric utility shall describe how the modeling tools used are appropriate for the system size, complexity, and market participation of the electric utility and are consistent with the current industry practices,"	Changed demonstration to description for purposes of reporting practicality. Due to the time and expense involved in acquiring software, putting it in production, and developing competency with modeling tools, whether or not such tools are explicitly mandated, it may not always be possible to guarantee that current tools represent the absolute objective best practices.	Incorporated where requested	
359	Ameren Missouri	060	21.060(4)(C)	Strike "3", and "and document" and insert "4" so that it reads "Based on the analysis in subsection (4)(B), the electric utility shall describe the methodology and the results..."	Methodology not an analysis	Incorporated where requested	
360	Ameren Missouri	060	21.060(4)(C)1.	Strike "annual"	Not all performance measures will be annual measures. In our view, none should be. The determination of performance measures in section (1) will control.	Not incorporated	Annual performance measures are necessary for the IRP, as they provide consistent year over year information needed for evaluating plan performance. While some measures may not be annual, retaining annual metrics ensures consistent evaluation across plans.
361	Ameren Missouri	060	21.060(4)(E)	Strike "and document"	Not analysis	Incorporated where requested	
362	Evergy, Inc.	060	21.060(4)(F) and (H)	~~(F) The electric utility shall conduct LOLE and EUE studies for year (5) of the planning horizon for each alternative resource plan that has undergone risk analysis.~~ Alternatively: (F) The electric utility shall conduct LOLE and EUE studies for year (5) of the planning horizon for ~~each~~ three (3) ~~alternative resource plan~~s that ha~~ve~~s ~~undergone risk analysis.~~ (G) The electric utility shall provide an updated table for each alternative resource plan that has undergone risk analysis, summarizing each alternative resource plan's annual performance measures over the planning horizon, as set forth in section (1). (H) After the risk analysis is completed, the electric utility shall identify the top four (4) alternative resource plans that the electric utility assesses best balance of the balancing factors.	Evergy recommends striking, or at least rewording, part (F), as resource planning already considers SPP reserve margin requirements, which are built on LOLE and EUE studies. Requiring Evergy to conduct similar studies for every alternative plan would be resource-intensive and inefficient as these models take drastically longer to run than capacity expansion/production cost models. Alternative language could limit LOLE and EUE analysis to a subset of representative portfolios (approximately 3 alternative plans); allow flexibility of evaluation criteria to identify the most relevant portfolios to study that reflect significant material differences in resource mix, cost, or reliability characteristics; and tie LOLE and EUE studies to the alternative plans selected in part (H).	Incorporated with modifications (see response for details)	LOLE/EUE studies have been limited to the top four ARPs, and the provisions F-H were reordered to better reflect the sequence of analysis. The top four requirement remains because it is statutory and must receive the detailed reporting and evaluation. Utilities may analyze additional plans if they choose.
363	Ameren Missouri	060	21.060(5)(A)	Strike "describe and document" and "assessment of the" and insert "identify a" and "list of the" so it reads "The electric utility shall identify a comprehensive list of the risks and uncertainties associated with..."	Can't describe and document an assessment, and what this appears to ask for is a list - then it tells us what to analyze	Incorporated where requested	
364	Ameren Missouri	060	21.060(5)(B)	Strike "and document"	A methodology is not an analysis	Incorporated with modifications (see response for details)	Struck "and document" and replaced it with "and justify," as the electric utility must still demonstrate that its methodology is sound.
365	Sierra Club	060	21.060(5)(D)1.	**Original Text:** ~~Each~~ The electric utility shall support each performance measure ~~shall be supported by~~ with quantitative analysis to the extent practicable and ~~by~~ with qualitative justification where necessary. **Sierra Club Suggestion for Revised Text:** ~~Each~~ The electric utility shall support each performance measure ~~shall be supported by~~ with quantitative analysis to the extent practicable ~~and by with qualitative justification where necessary~~:	Sierra Club recommends striking "and with qualitative justification where necessary." Qualitative analysis will make it more difficult to provide unbiased comparisons across resource plans.	Not incorporated	The performance measures are quantitative, but there may be instances where a short qualitative explanation is needed to convey nuance in what the results mean or what the results indicate.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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366	Ameren Missouri	060	21.060(5)(D)2.A.	Strike "Advancing or delaying deployment of specific resources to access plan resilience to timing changes".	This is more appropriately considered as part of one or more additional alternative resource plan portfolios. For example, a potential delay in a major resource may necessitate examination of a different alternative resource plan portfolio that accounts for such a potential delay.	Not incorporated	The provision is intended to determine whether small timing changes within an ARP produce major swings in the overall cost effectiveness and viability of the ARP. Minor impacts indicate the ARP is sufficiently resilient, while major impacts may warrant examining a different ARP. This process helps avoid extra CEM runs, reduces modeling burden and should save the electric utilities additional CEM and other model runs and saves time and resources.
367	Ameren Missouri	060	21.060(5)(D)2.C.	Strike "Accelerated build requirements needed to address near term reliability or compliance needs	This should have already been addressed, to the extent possible, in the development of alternative plans/portfolios.	Not incorporated	This provision is necessary to capture cases where capacity expansion model (CEM) outputs result in build sequences that are inefficient or not operationally optimal.
368	Ameren Missouri	060	21.060(5)(D)2.D.	Strike " Reasonable rate case timing to evaluate the effect of early, delayed, or staggered cost recovery on forecasted revenue requirements and customer rate trajectories, where the results shall demonstrate how timing assumptions influence affordability and plan selection;	Rate case timing should not be a consideration in assessment revenue REQUIREMENT (i.e., the revenue required to recover all prudently incurred costs, including a fair return). Please see Ameren Missouri's comments submitted on may 7, 2026, pages 10-11 for a discussion of this item.	Incorporated where requested	
369	Evergy, Inc.	060	21.060(5)(D)2.D.	~~(D) Reasonable rate case timing to evaluate the effect of early, delayed, or staggered cost recovery on forecasted revenue requirements and customer rate trajectories, where the results shall demonstrate how timing assumptions influence affordability and plan selection;~~	Evergy recommends striking this rate case timing requirement, consistent with its original comments. The rate making outcomes are not relevant to determining which plan has the lowest cost, or risk analysis, but only tells how the cost is recovered, which is addressed in a different process. Rate case timing is solely a management decision, and many factors can cause the timing of a particular rate case to be filed faster, slower or not at all.	Incorporated where requested	
370	Ameren Missouri	060	21.060(5)(D)2.E.	Strike "other factors" and insert "relevant emerging factors"	See earlier comments about definition of relevant emerging factors	Partially incorporated (see response for details)	Struck "other factors" and did not add "relevant emerging factors," as it is unnecessary.
371	Ameren Missouri	060	21.060(5)(E)	Strike "and document"	Not an analysis	Incorporated where requested	
372	Ameren Missouri	060	21.060(5)(E)1.B.	Strike "and document" and insert "and provide any documentation relied upon for the assumptions" so it reads "Describe the data sources and assumptions supporting that range and provide any documentation relied upon for the assumptions;"	Data sources and assumptions are not an analysis but reasonable to provide documentation underlying them if relied upon	Incorporated where requested	
373	Ameren Missouri	060	21.060(5)(E)1.D.	Strike "and document"	Not an analysis	Incorporated with modifications (see response for details)	For (5)(E)2.D., "describe and document" was replaced with "explain," to better reflect the intended meaning.
374	Ameren Missouri	060	21.060(5)(F)	Strike "conduct" and "studies" and insert "analyze and report" and "metrics" so it reads "The electric utility shall analyze and report LOLE and EUE metrics for year (5) of the planning horizon for each alternative resource plan that has undergone risk analysis"	Edited for clarity of the presumed intent. A "study" implies a much more involved effort akin to the LOLE study conducted by MISO (i.e., determining planning reserve margins, accreditations, etc.). In contrast, the LOLE and EUE metrics can be determined for alternative resource plans through modeling without a separate study.	Incorporated where requested	
375	CGA	060	21.060(5)(F)	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 generators and at year five, at minimum.	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.	Incorporated with modifications (see response for details)	Substantially adopted the recommended language.
376	Ameren Missouri	060	21.060(5)(G)	Strike "updated", "annual", and "over the planning horizon" and insert "that includes" so it reads "...shall provide a table that includes each alternative resource plan that has undergone risk analysis, summarizing each alternative resource plan's performance measures, as set forth in section (1)."	One table for all alternative plans rather than a table for each plan. Not all performance measures will be annual measures. In our view, none should be. The determination of performance measures in section (1) will control.	Not incorporated	Annual performance measures are necessary for the IRP.
377	Ameren Missouri	060	21.060(5)(H)	Strike "four (4)	Strictly requiring 4 (not 5, not 3) ignores that there may be a natural break between "top plans" and the rest.	Not incorporated	The number of plans is prescribed by statute.
378	Ameren Missouri	060	21.060(5)(I)	Insert "top" and "identified in subsection (1)(H)	Should be focused on the alternative plans that are in the running to be selected as the preferred resource plan.	Incorporated where requested	

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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379	Sierra Club	060	21.060(6)(B)	**Original Text:** Contingency Analysis. 1. ~~Contingency~~ The electric utility shall develop a contingency analysis of the preferred resource plan ~~shall be included~~ to address significant deviations from base assumptions, including but not limited to— A. Market price changes for key components of selected resource types; B. Market price changes for capacity, energy, and ancillary services; C. Changes to tax incentives for all selected resource types; D. Restrictions on generation output from selected supply-side resource types; E. Load assumptions; and F. Ongoing litigation regarding existing resources. 2. Based on the contingency analysis, the electric utility shall— A. Identify, describe and document the expected risk mitigation strategies that may be employed as a result of the contingency analysis; and B. Identify the alternative resource plans that would best satisfy the performance measures in response to the contingency analysis.	General Comment: Sierra Club recommends that the Commission provide more specific requirements on, or limitations to, contingency analysis.	Partially incorporated (see response for details)	Added a requirement for "justification," using the definition in Rule 015, to provide clearer expectations and limitations for contingency analysis as requested.
380	Ameren Missouri	060	21.060(6)(B)1.	Strike "including" and insert "which may include"	It may not be reasonable to test for changes in tax incentives for natural gas-fired turbines, for example.	Partially incorporated (see response for details)	Adjusted language in (5)(B)1.C. from "all selected resource types" to "the selected resource types"
381	Liberty-Empire	060	21.060(6)(B)1.	Clarification of expectation for contingency analysis.	What is expected in the contingency analysis? Is this asking for analysis based on risks to pricing, tax credits, load, etc.? Is this a new/enhanced requirement, or the same as previous rules where a qualitative discussion can serve as contingency if the preferred plan cannot be executed? If this is a new requirement, more detail is needed.	Not incorporated	The rule specifies the necessary components of the contingency analysis which should provide the needed clarity.
382	Ameren Missouri	060	21.060(6)(B)1.C.	Strike "all"	It may not be reasonable to test for changes in tax incentives for natural gas-fired turbines, for example.	Incorporated where requested	
383	Ameren Missouri	060	21.060(6)(B)2.A.	Insert "and" and strike "and document"	Not an analysis	Incorporated where requested	
384	Ameren Missouri	060	21.060(6)(C)2.	Strike "s" in "scenarios"	For agreement in number.	Incorporated where requested	
385	Evergy, Inc.	060	21.060(6)(C)3.	3. The electric utility shall clearly identify tradeoffs among performance measures~~and explain how the preferred resource plan balances the balancing factors.~~	Evergy maintains its original comment that this requirement is overly prescriptive, burdensome, and not necessary to evaluate the preferred resource plan. In addition, the directive to "clearly identify tradeoffs" is inherently subjective and provides no meaningful standard for what level of detail or format would satisfy the rule, creating compliance uncertainty.	Not incorporated	The utility's perspective on how the balancing factors are addressed is important and provides essential insight for the commission's consideration.
386	Ameren Missouri	060	21.060(6)(D)	Insert "Respecting its internal decision-making process" and "the electric utility shall" and strike "describe and document its internal decision making process" so it reads "Respecting its internal decision- making process, the electric utility shall"	Series of actions utility is to take - using correct verbs below	Incorporated with modifications (see response for details)	Revised the opening clause of (D) to reflect the suggestion and accepted the updated words in the subsequent list.
387	Ameren Missouri	060	21.060(6)(D)1.	Insert "Description" and strike "describe"	Series of actions utility is to take - using correct verbs	Incorporated where requested	
388	Ameren Missouri	060	21.060(6)(D)2.	Insert "Provide a" and "and documentation underlying the analysis" so it reads "Provide a summary of key findings from quantitative analysis and documentation underlying the analysis and stakeholders' feedback that influenced preferred resource plan selection;"	Series of actions utility is to take - using correct verbs	Incorporated where requested	
389	Ameren Missouri	060	21.060(6)(D)3.	Strike "Explanation of" and insert "Explain"	Series of actions utility is to take - using correct verbs	Incorporated where requested	
390	Ameren Missouri	060	21.060(6)(D)4.	Strike "Specification" and insert "Specify"	Series of actions utility is to take - using correct verbs	Incorporated where requested	
391	Ameren Missouri	060	21.060(6)(D)5.	Insert "Provide"	Series of actions utility is to take - using correct verbs	Incorporated where requested	
392	Ameren Missouri	060	21.060(6)(D)6.	Strike "Quantification" and insert "Quantify", and strike "at a minimum" and "annual" and insert "the net present value of" so it reads "Quantify the expected value of better information concerning the critical uncertain factors that affect the performance of the preferred resource plan, as measured by the net present value of utility revenue requirements; and"	If an uncertain factor is not critical, there is no value to better information regarding that uncertain factor, by definition.	Incorporated where requested	
393	Ameren Missouri	060	21.060(6)(D)7.	Insert "Provide a"	Series of actions utility is to take - using correct verbs	Incorporated where requested	
394	Ameren Missouri	060	21.060(6)(E)	Strike "four (4)"	See previous comment regarding top plans.	Not incorporated	The top 4 plans is statutory for rate impact, and the intention is to make all analysis consistent with that. Utilities may choose to do additional analysis on more plans, but the minimum of 4 needs to be maintained.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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395	Evergy, Inc.	060	21.060(6)(E)	~~6. Include financial performance measures specified in paragraph (1)(C)3. annually through year ten (10) of the planning horizon.~~	Evergy recommends striking the new requirement that a utility evaluation scorecard consider financial performance ratios, as these proposed requirements are not required by Section 393.1900 RSMo.	Not incorporated	Financial ratios are required under the existing Chapter 22 rules and are necessary to evaluate a utility's ability to finance new resources under an alternative resource plan. The requirements have been substantially reduced from earlier drafts.
396	Renew Missouri	060	21.060(6)(E)	(E) The electric utility shall summarize the results of its evaluation for the top four (4) alternative resource plans using a comparative scorecard or equivalent matrix that presents all of the performance measures and risk scenarios in a clear, reproducible format. The scorecard shall— 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; 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; 6. Include financial performance measures specified in paragraph (1)(C)3. annually through year ten (10) of the planning horizon. 7. Include expected transmission costs, including potential upgrades for load and interconnection of supply-side resources; and 8. Include expected distribution costs, including potential upgrades for load and interconnection of distributed energy resources, 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.	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 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).	Not incorporated	Fuel procurement and fuel cost considerations were added in (2)(B)2.B. to provide the needed transparency and comparability. Duplicating them here seems repetitive.
397	Ameren Missouri	060	21.060(6)(E)4.	Strike " Present results for both the implementation period and full planning horizon;"	Isolating four years out of the full planning horizon provides no useful information for decision making.	Not incorporated	Performance measures can vary meaningfully between the initial four year implementation period and the full sixteen year planning horizon, and both are needed for a complete IRP evaluation.
398	Ameren Missouri	060	21.060(6)(E)5. and 6.	Strike " 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;" Strike " Include financial performance measures specified in paragraph (1)(C)3. annually through year ten (10) of the planning horizon;"	Performance measures are covered in (E) already. This is duplicative.	Not incorporated	This language is necessary to clarify how LOLE/EUE results are to be presented. Without it, the rule could imply that metrics must be provided for each year of the planning horizon, which was not intended and would substantially increase modeling requirements and computational burden.
399	Ameren Missouri	060	21.060(6)(E)7. and 8.	Strike " Include expected transmission costs, including potential upgrades for load and interconnection of supply-side resources; and" Strike " Include expected distribution costs, including potential upgrades for load and interconnection of distributed energy resources."	These are inputs, not results.	Not incorporated	The language in both bullets was edited to insert "total" before "distribution" and "transmission" in order to clarify the intent of the request, which is to provide the sum of the costs based on the input assumptions and the selection of resources in plans.
400	Ameren Missouri	060	21.060(6)(F)	Strike "four (4)"	See previous comment on top plans.	Not incorporated	The top 4 plans is statutory for rate impact, and the intention is to make all analysis consistent with that. Utilities may choose to do additional analysis on more plans, but the minimum of 4 needs to be maintained.
401	Evergy, Inc.	060	21.060(6)(F) and (G)	~~(F) The electric utility shall quantify the forecasted rate impacts of the top four (4) alternative resource plans, based on the scorecard required in subsection (5)(E), including the preferred resource plan, over the planning horizon.~~ ~~1. Annual rate impact estimates, specified in subparagraph (1)(C)2.D., shall include:~~ ~~A. Base rates and fuel cost components; B. Anticipated changes in revenue requirements;~~ ~~C. Estimated annual percentage change in rates by class based upon the electric utility's most recently proposed class cost of service allocation factors; D. Reasonable rate case timing scenarios; and~~ ~~E. Inclusion of regulatory treatments of cost that the electric utility intends to request.~~ ~~(G) The electric utility shall discuss the modeled impacts of rate changes on future electric loads and the derivation of elasticity assumptions.~~	Evergy maintains its original recommendation to revise these requirements regarding annual rate impacts of the alternative resource plans. Evergy recommends removing the prescriptive requirements in (F) and (G). Generating these detailed analyses of rate impacts by customer class will increase the burden on the Company by requiring another full financial model and is outside the purview of a resource plan and will increase costs to customers.	Partially incorporated (see response for details)	Removed (D) and (E) to reduce prescriptive detail, but retained the remaining requirements because rate impact analysis is mandated by statute and is essential for commission evaluation of rate impact.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
Comment Response Table

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402	Ameren Missouri	060	21.060(6)(F)1.C.	Strike "by class based upon the electric utility's most recently proposed class cost of service allocation factors;" Strike "Reasonable rate case timing scenarios; and" Strike "Inclusion of regulatory treatments of cost that the electric utility intends to request"	Class-level rates, rate case timing, and regulatory treatments are best handled in rate cases for the reasons stated in our comments on 5/7/2026.	Partially incorporated (see response for details)	The "by rate class" requirement has been removed to address concerns. Annual rate impacts remain as it is necessary.
403	Ameren Missouri	060	21.060(6)(G)	Strike "The electric utility shall discuss the modeled impacts of rate changes on future electric loads and the derivation of elasticity assumptions"	Price elasticity is considered as part of the load analysis and forecasting and should be discussed as part of that section.	Incorporated where requested	
404	Ameren Missouri	060	21.060(6)(H)	Insert "in its work papers"	This is an enormous amount of data.	Incorporated where requested	
405	Evergy, Inc.	065	21.065	Refinement of Implementation Plan Development and Reporting Requirements	Evergy provides the following general comments: Section 21.065 requires the submission of extensive information regarding supply-side resources, including, among other things, engineering and construction phase schedules, detailed cost estimates for those phases, and identification of major milestones. As noted below, the requirement to identify "major" milestones is inherently subjective and does not provide utilities with a clear, objective standard for compliance. Additionally, the level of detail required effectively presumes that a resource is fully developed or under contract. By requiring site-specific characteristics and granular development information, this section exceeds statutory requirements for identifying a preferred plan to provide safe and adequate service at just and reasonable rates. Further, Section 21.065 goes beyond using the types of generation technologies proposed for generation facilities and results from a request for information or proposals to provide any new supply-side resources needed.	Not incorporated	Modifications were made primarily based on Ameren's comments on the section. The level of detail remains because the commission must have sufficient information to make an evidentiary-based determination.
406	Liberty-Empire	065	21.065	Clarification of intent on level of detail required.	What is the intent and reasoning behind the significant increase in information (such as schedule for engineering and construction phases)? This information is often site and unit specific when resource planning relies on generic resources.	Not incorporated	The required information ensures the commission has sufficient information to determine if a limited inquiry can be granted for each supply side resource in the implementation plan.
407	New Energy Economics	065	21.065	For the model RFP and competitive procurement, the implementation plan shall identify, for each implementation period for each resource or resource quantity: 1. The identified resource need addressed 2. The procurement method 3. The reason for selecting that procurement method 4. The planned solicitation or acquisition schedule 5. Required Commission approvals 6. The role of any independent evaluator or independent administrator 7. The treatment of utility self-build or affiliate bids 8. Customer programs or demand-side resources relied upon 9. Distributed energy resources or customer-side resources relied upon 10. Transmission and interconnection assumptions 11. Fuel-supply assumptions, where applicable 12. Implementation milestones After completion of any competitive procurement used to implement or validate the preferred resource plan, the electric utility shall file a post-procurement report showing whether bid results support retaining, modifying, or replacing the approved preferred resource plan. The report shall identify changes to resource quantities, resource types, timing, ownership structures, contract structures, transmission assumptions, customer-program assumptions, cost assumptions, risk assumptions, and implementation actions. For customer cost-risk reduction the implementation plan shall identify, for each implementation-period resource action: 1. The expected capital cost; 2. The expected fixed and variable O&M cost; 3. The expected delivered fuel cost; 4. Pipeline reservation, transportation, storage, and hedging costs, if applicable; 5. Coal transportation, coal supply, and environmental compliance costs, if applicable; 6. Expected purchased-power exposure; 7. Expected fuel adjustment clause or other cost-recovery exposure; 8. Expected bill impacts by rate class; 9. Large-load cost-causation and nonparticipating-ratepayer impacts, if applicable; 10. Transmission and interconnection cost risks; 11. Tax-credit assumptions and risks; 12. Key cost-risk mitigation actions; and 13. Trigger points requiring an update to the implementation plan. Trigger-based updates: The utility shall file an implementation-plan update if fuel costs, delivered fuel costs, transportation costs, purchased-power costs, coal-unit costs, large-load assumptions, tax-credit assumptions, transmission costs, resource-accreditation assumptions, or capital costs materially change from the assumptions used to select the preferred resource plan. Post-procurement reporting: After any procurement used to implement or validate the preferred resource plan, the utility shall file a report identifying whether market results support retaining, modifying, or replacing the preferred resource plan. The report shall identify changes to resource costs, resource types, timing, ownership structures, contract structures, fuel-cost assumptions, customer-program assumptions, transmission assumptions, and customer cost-risk exposure.	The Commission's proposed rule should convert the implementation plan into a practical procurement and customer protection blueprint. The plan should not simply list resources the utility intends to build or acquire. It should explain how each implementation-period resource need will be procured, whether the procurement will be all-source, how utility self-build bids will be treated, and how the Commission and stakeholders will be informed of procurement results. The implementation plan should identify not only what the utility plans to build or acquire, but also the customer cost risks created by those actions. Commission's proposed rule should require an implementation-period cost-risk plan and trigger-based updates when costs or risks materially change.	Not incorporated	As indicated in Comment Nos. 2, 10, 11, 90, 231, 260, 285, 307, 417, and 418, the model RFP proposal is overly prescriptive and was not included. The rule currently includes requirements in 021.065(1) for the electric utility to submit procurement policies and procurement information for supply-side resources that are scheduled to commence construction during the implementation period.

Missouri Public Service Commission
Integrated Resource Plan Rule Development for Electric Utilities
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408	Ameren Missouri	065	21.065(1)(B)	Insert "to the extent known at the time of filing", "or specified quantities of supply-side resources by resource type for which construction is expected to begin during the implementation period" and "and any documentation relied on respecting those features" and strike "and document"	Some resources for which implementation is expected to commence during the 4-year implementation period (which begins approximately one year after filing) may not be known with specificity (e.g., resource implementation may require additional bids and contract negotiations). Strike "Document" because it is not an analysis SB4 contemplates both specific resources and quantities of resource types without explicit project specifications.	Incorporated with modifications (see response for details)	The language was edited to "For each specified supply-side resource, or specified quantity of supply-side resource by supply-side resource type for which construction is expected to begin during the implementation period, the electric utility shall describe, if known, and document, if applicable, the following..."
409	Ameren Missouri	065	21.065(1)(B)8.	Strike "Whether the electric utility is seeking limited inquiry"	See below – if construction is planned to start within implementation period then limited inquiry CCN is available as a matter of law	Incorporated where requested	
410	Ameren Missouri	065	21.065(1)(C)	Strike " For any supply-side resource the electric utility requests the commission to consider for limited inquiry, the electric utility shall provide the following, in addition to the information requested in subsection (1)(B):	SB4 contemplates implementation of both specific projects and quantities of resources by resource type without distinguishing the treatment of one from the other. Details can be provided at the time of filing to the extent known. This should not preclude a determination by the Commission that resources or quantities of resources by type in the utility's implementation plan are part of a reasonable and prudent preferred resource plan, and are therefore eligible for the limited inquiry CCN process.	Incorporated where requested	
411	Evergy, Inc.	065	21.065(1)(C)3.	~~3. Identification of critical paths and major milestones, including decision points for committing to major expenditures;~~	Evergy recommends striking this requirement because it is vague and lacks clear, objective guidance regarding what constitutes "major" milestones or expenditures.	Not incorporated	The term "major milestone" reflects a standard industry term.
412	Ameren Missouri	065	21.065(1)(D)2.	Insert " Plans for implementing demand-side resources, including expected requests for approval of programs pursuant to the Missouri Energy Efficiency Investment Act.		Not incorporated	The rule is drafted consistent with the authorizing statute. The implementation plan includes supply side resources only.
413	Ameren Missouri	065	21.065(1)(D)5.	Insert "resource related"	Should be limited to those investments with a nexus to resource planning.	Incorporated with modifications (see response for details)	Changed to language to "supply-side resources" to ensure clarity.
414	Ameren Missouri	065	21.065(1)(D)6.B.	Strike "document and provide" and insert "provide supporting documentation relied upon together with a" so that it reads "For each short-term alternative, the electric utility shall describe and provide supporting documentation relied upon together with a summary table including the"	One would not document a summary table – edits to reflect what appears to be intended	Incorporated with modifications (see response for details)	The language was edited to "For each short-term alternative, the electric utility shall describe, and provide supporting documentation relied upon together with a summary table including the: ..."
415	Ameren Missouri	065	21.065(2)(B)4.	Insert "or quantity of resources by type"	SB4 contemplates both specific projects and quantities of resources by type.	Incorporated where requested	
416	CGA	065	21.065(D)(1)	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.	Not incorporated	As indicated in Comment Nos. 90, 312, and 408, requiring detailed RFP templates and some of the results is overly prescriptive and was not included.

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Integrated Resource Plan Rule Development for Electric Utilities
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417	New Energy Economics	New Rule 070	21.070	Recommended New Section: 20 CSR 4240-21.070 - Competitive Procurement, Customer Cost-Risk Reduction, and Post-Procurement Reporting In addition to the more limited documentation requirement in subsection (1)(D)1, the rule should include a new section with the following two subsections… **20 CSR 4240-21.070 Competitive All-Source Procurement and Post-Procurement Reporting.** This section should establish: 1. A default all-source procurement requirement for material implementation-period resource needs; 2. Minimum model RFP and procurement-plan requirements; 3. Eligibility for utility self-build, affiliate, third-party, customer-side, demand-side, distributed, storage, hybrid, transmission-enabled, market, and bilateral alternatives; 4. Independent evaluator or independent administrator requirements; 5. Comparable treatment of utility-owned, affiliate, and third-party bids; 6. Bid documentation and confidentiality procedures; 7. Stakeholder review procedures; 8. Post-procurement reporting requirements; and 9. The relationship between procurement results, preferred resource plan modifications, and limited-inquiry eligibility. For any resource need identified in an integrated resource plan that may result in construction, acquisition, contracting, or cost recovery during the implementation period, the electric utility shall conduct competitive all-source procurement unless the Commission finds, based on record evidence, that such procurement is not practicable or not in the public interest. If the electric utility or an affiliate submits, sponsors, or materially supports a bid or self-build proposal, the solicitation shall include an independent evaluator. The Commission may require an independent administrator when necessary to protect bidder confidence, prevent discriminatory treatment, or ensure a fair solicitation. The rules shall protect commercially sensitive bid information during active procurement while requiring sufficient post-procurement disclosure for the Commission, Staff, Public Counsel, stakeholders, and the public to evaluate whether the procurement was fair, competitive, and consistent with the approved procurement plan. And the following should also be added to effectively address risk. 20 CSR 4240-21.070 Customer Cost-Risk Reduction and Post-Procurement Reporting. This section should require: 1. Delivered-fuel-cost analysis; 2. Fuel-delivery risk analysis; 3. Fuel adjustment clause and purchased-power exposure reporting; 4. Coal lifecycle economics; 5. Clean-capacity replacement portfolios for new gas and coal-retention plans; 6. Large-load cost-causation and nonparticipating-ratepayer protections; 7. Market-tested cost assumptions; 8. Minimum cost-risk stress cases; 9. Implementation-plan risk updates; and 10. Post-procurement reporting showing whether market results reduce or increase customer cost risk. For each material resource need, the utility shall demonstrate that the preferred resource plan and implementation plan are designed to meet reliability needs at the lowest reasonable cost and lowest reasonable customer risk. The utility shall compare the preferred plan against alternatives that reduce	NEE recommends that the Commission consider adding a new procurement-focused section to avoid scattering procurement requirements across multiple rule sections. A new section would make the rule clearer and easier to apply. NEE recommends that the Commission consider adding a new section to consolidate customer cost-risk requirements. A dedicated section would make the rule clearer and easier to administer.	Not incorporated	As indicated in Comment Nos. 2, 10, 11, 90, 231, 260, 285, 307, 407, and 418, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included. Note this was a new rule in its entirety that was proposed, which was not incorporated.
418	New Energy Economics	#N/A		**Model RFP and Competitive Procurement** For any preferred resource plan that includes a material resource addition, retirement, acquisition, contract, or construction decision during the implementation period, the electric utility shall identify whether the resource need will be tested through competitive all-source procurement. If the utility proposes not to use competitive all-source procurement, it shall explain why such procurement is not practicable or not in the public interest. The preferred resource plan shall identify the market-tested cost information used to support the plan and shall explain how future procurement results will be used to validate, modify, or replace the preferred resource plan. **Customer Cost-Risk Reduction** **Minimum cost-risk stress cases: The utility shall test each material alternative resource plan and the preferred resource plan under minimum cost-risk, fuel-risk, and market-risk cases, including:** **1.** High delivered natural gas cost; 2. Low delivered natural gas cost; 3. Natural gas deliverability constraint; 4. Winter extreme-weather fuel availability; 5. High purchased-power market prices; 6. Coal fuel cost increase; 7. Coal transportation cost increase; 8. Coal environmental-compliance cost increase; 9. Coal forced-outage or low-availability case; 10. High large-load materialization; 11. Delayed or non-materialized large load; 12. Large-load exit or reduced-load case; 13. High transmission and interconnection cost; 14. Tax-credit delay, reduction, or loss; 15. High capital cost and interest-rate case; 16. Resource-accreditation reduction; and 17. Clean-capacity cost decline. Clean-capacity comparison: · For each alternative resource plan and preferred resource plan that includes new natural gas generation, continued coal operation beyond an economically optimal retirement date, coal life-extension investment, delayed coal retirement, or major coal environmental-compliance investment, the electric utility shall evaluate at least one clean-capacity replacement portfolio. · The clean-capacity replacement portfolio shall include, where reasonably available, solar, wind, battery storage of multiple durations, demand-side resources, energy efficiency, distributed energy resources, DER aggregations, customer-supplied resources, virtual power plants, transmission-enabled alternatives, market purchases, and bilateral contracts. · The comparison shall include annual revenue requirement, net present value of revenue requirement, rate impacts by customer class, fuel-price risk, delivered-fuel risk, environmental-compliance risk, resource-adequacy performance, expected unserved energy, transmission and interconnection costs, market-purchase exposure, and customer exposure through fuel adjustment clauses or other cost-recovery mechanisms. Customer exposure: For each alternative resource plan and the preferred resource plan, the utility shall quantify customer exposure under fuel adjustment clauses, purchased-power recovery, trackers, riders, deferred accounting, securitization, stranded-cost recovery, and other cost-recovery	The preferred resource plan should be supported by both modeling and market evidence. If the utility identifies a material implementation-period resource need, the IRP should explain whether that need will be tested through all-source procurement and how the results of procurement could confirm, modify, or replace the preferred resource plan. The alternative resource plan and preferred resource plan section is the most important place to require cost-risk testing. The Commission's proposed rule strengthens risk analysis, but it should identify minimum required stress cases so that fuel, market, coal, large-load, tax-credit, transmission, and reliability risks are tested consistently.	Not incorporated	As indicated in Comment Nos. 2, 10, 11, 90, 231, 260, 285, 307, 407, and 417, the model RFP proposal is overly prescriptive and was not included. Therefore these related modifications were not included.

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

Pursuant to 386.290, RSMo., I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 29th day of October, 2026.

Nancy Dippell
Secretary

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Date: 2026.10.29 14:16:19 -05'00'

MISSOURI PUBLIC SERVICE COMMISSION

October 29, 2026

Case No: EX-2027-0085

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Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s). [1]

Sincerely,

Nancy Dippell

Nancy Dippell
Secretary

[1] Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.