Data Request Received: **2026-09-21** Response Date: 2026-10-05
Request No. 0010 Witness/Respondent: Aaron Doll
Submitted by: Eric Vandergriff, Eric.Vandergriff@psc.mo.gov

REQUEST:

Please identify all testimony in support of inclusion of TCR/ARR revenue in the calculation of MPPM. Please identify all Commission orders that directly address inclusion of TCR/ARR revenue in the calculation of MPPM.

RESPONSE:

Below is a list organized by docket identifying the support of inclusion of ARR/TCR revenue in the calculation of the MPPM, inclusive of both testimony and Commission orders. Given that ARR/TCR revenues are only provided by SPP as part of its marketplace, the language below either specifically identifies ARR/TCR or specifically identifies SPP market revenues. There is no separate distinction in any testimony or Order separating SPP market revenues based on source (energy, make-whole, ancillary, congestion, etc.).

EA-2019-0010

- **Report and Order. Pg. 59**
  - "*Market Price Protection Mechanism. The market price protection mechanism, as described more fully in* ***Appendix B to the Non-Unanimous Stipulation and Agreement****, and attached hereto, shall be implemented. In general terms, that mechanism seeks to provide for the sharing of risk between customers and shareholders associated with the possibility of reduced market prices and wind production associated with the Wind Projects. Such mechanism reflects the possibility that all Wind Projects may not be included in Empire rates in the same rate case. As such, the mechanism shall go into effect on the first day of the month after the effective date of rates in which a Wind Project is first placed into rates and shall remain in effect for 10 years following the*

effective date of rates resulting from the first general rate case in which all Wind Projects are included in rates."

- Appendix B to the Non-Unanimous Stipulation and Agreement. Pg. 17
  - *On an annual basis, the Annual Wind Value (AWV) will be calculated based on the **SPP market revenues earned by the Wind Projects** (SSP$) less the Wind Projects costs (WRR) plus the value associated with avoiding the replacement of the existing wind power purchase agreements (PPA_Replacement)*.
  - *The **SPP Revenue is based on the SPP invoice for total revenue** earned by the Wind Projects.*

ER-2021-0312

- **Public Counsel's Position On The Amended List Of Issues. Pg. 11**
  - *"OPC Position: The MPPM should accurately include **all revenues the Wind Projects generate that are passed to Empire's customers. This includes Southwest Power Pool Integrated Market revenues**, paygo payments, revenue from the sale of renewable energy credits, and the value of the production tax credits."*
- **Report and Order. Pg. 20**
  - ***"**Empire is authorized to file tariff sheets sufficient to recover revenues approved in compliance with this Report and Order and the Commission's March 9, 2022, **Order Approving Stipulations and Agreements**."*
  - **Order Approving Stipulations and Agreements. Pg. 4**
    - *"The Non-Unanimous Partial Stipulation and Agreement is approved. It is attached to this order, and its terms are incorporated by reference. The signatories to that stipulation and agreement are ordered to comply with its terms. The Second Partial Stipulation and Agreement is approved. It is attached to this order, and its terms are incorporated by reference. The signatories to that stipulation and agreement are ordered to comply with its terms. The Stipulation and Agreement as to EDRA is approved. It is attached to this order, and its terms are incorporated by reference. The signatories to that stipulation and agreement are ordered to comply with its terms. **The Fourth Partial Stipulation and Agreement is approved**. It is attached to this order, and its terms are incorporated by reference. The signatories to that stipulation and agreement are ordered to comply with its terms*."
      - **Fourth Partial Stipulation and Agreement. Pg 7**
        - *"**All wind project revenues returned to customers, including SPP IM revenues**, revenues from the sale of RECs, Paygo, the value of the production tax credits, and all miscellaneous revenues."*
- **Direct Testimony of Lena Mantle. Pg. 25, 15**

- *1. The MPPM should include **all costs and benefits as paid and received by Empire's customers***
- *The only benefit shown in the MPPM are the SPP integrated market ("IM") revenues*

- **Rebuttal Testimony of Lena M. Mantle. Pg 44**
  - ***Q. "Do you agree with Staff's or Empire's positions with respect to the revenues to be included in the MPPM calculations?***
    A. ***No. As I stated in my direct testimony, all sources of revenue should be included*** *so I do not agree with Staff's position of only SPP market revenues being included. Empire in its data request response lists revenue streams that should be included as SPP market revenues— revenues from the sale of RECs, paygo, and a revenue stream consistent with the value of any production tax credits Empire may receive. This is consistent with the revenue streams that I proposed being included in the MPPM in my direct testimony. However, Empire limits the revenues that are included in the MPPM to the revenues that can be passed back to the customers as an immediate offset to base rates.*
- **Surrebuttal Testimony of Lena M. Mantle. Pg 25-26**
  - ***Q. Would you Summarize your position regarding the MPPM***
    - *A. "The MPPM should accurately include all costs and benefits associated with the Wind Projects"*

ER-2024-0261

- **True-Up Rebuttal Testimony of Aaron J. Doll. Pg 5**
  - "*In Case No. ER2021-0312, OPC explicitly stated that "The MPPM should accurately include all revenues the Wind Projects generate that are passed to Empire's customers1." Furthermore, the Fourth Partial Stipulation and Agreement provides that the MPPM shall include "All wind project revenues returned to customers, including SPP IM revenues, revenues from the sale of RECs, Paygo, the value of the production tax credits, and all miscellaneous revenues." **ARR/TCR revenues and insurance recoveries fall squarely within that scope.**"*