



December 29, 2009

John Rogers
Utility Regulatory Manager
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65102-0360

RE: EW-2009-0412 Rulemaking, MEDA Comments

Dear Mr. Rogers:

On behalf of the MEDA utilities, this letter is in response to the draft Integrated Resource Planning (IRP) rules (4 CSR 240-22), which you circulated via email on December 17th.

The Missouri utilities, independently and through MEDA, have consistently voiced their concern about Staff's draft IRP rules expanding the 'check-list' approach to resource planning and this concern remains. Further, the utilities have provided a draft IRP rule as well as specific comments at the various workshops and at a November 20th meeting held with Staff. This letter will not reiterate all of our concerns, but rather will limit itself to some general concerns with the draft rule.

First, while the MEDA utilities recognize that Staff has removed the phrase "smart grid" from the draft rule, Staff merely replaced with the phrase "advanced technologies," without defining the term. This change does not address the substance of the initial concerns identified by the MEDA utilities and we continue to believe this matter should be addressed in a separate proceeding. MEDA also continues to believe the transmission and distribution planning rules proposed in Staff's draft are unnecessary and duplicative and that they should be removed from the draft rule. Finally, the MEDA utilities note that Staff has not provided for a pre-approval option, as has been requested by Missouri utilities.

The MEDA utilities urge Staff to reconsider adopting the MEDA draft rule, as it is designed to allow utilities the flexibility to plan in the manner most appropriate for each utility and to still provide Staff and any intervenor with the information necessary to participate in the planning process and evaluate the end result, i.e. the plan.

If you have any questions regarding this, please do not hesitate to e-mail me at Warren@missourienergy.org or call me at (573) 634-8678.

Sincerely,

A handwritten signature in black ink, appearing to read "Warren T. Wood". The signature is fluid and cursive, with the first name "Warren" being more prominent than the last name "Wood".

Warren T. Wood, PE
President