

## Draft Staff Guiding Principles for 4 CSR 240-22

- **Overarching Principle**
  - Rules which result in resource acquisition strategies which:
    - Can be expected to provide the public with energy services that are safe, reliable and efficient, at just and reasonable rates, in compliance with all applicable state and federal energy and environmental laws, and in a manner that serves the public interest; and
    - Are robust and founded upon sound analysis and decision making techniques.
- **Transparency**
  - Stakeholder input prior to and after triennial compliance filings and annual updates;
  - Comprehensive triennial compliance filings and detailed workpapers to include all formulas;
  - Utility, Staff, OPC and stakeholders resolution of identified deficiencies and concerns with reports to Commission;
  - Implementation plan of each utility preferred resource plan is consistent with the utility's business plan;
  - Robust annual update workshops and filings;
  - High quality summary of each utility's preferred resource plan which is non-technical and readily available to the utility's customers and the general public.
- **Analytical Processes**
  - Do not "date" the rules (e. g., no specific references to state and federal laws); and
  - Enough structure to assure sound analysis, but with flexibility for alternative and equivalent or better approaches with documentation of alternative analytical process and rationale for deviating from rules.
- **Utility Decision Making**
  - Thorough explanation of decision making process;
  - Risk analysis of preferred resource plan with anticipated contingency options; and
  - Commitment of utility officer.
- **Commission Decision Making**
  - Process to correct outstanding deficiencies and/or concerns in a defined time period; and
  - Hearings as necessary for both triennial compliance filings and annual updates.