

As Proposed	Stakeholder Recommendation	Staff Response
n/a - add definitions	<p><i>Recommendation to add a new section (1) to include definitions</i></p> <p>(1) Definitions. The following definitions shall apply to this rule: (A) Facility is a site at which electric generating unit(s), and/or equipment for converting mechanical, chemical, and/or nuclear energy into electric energy are situated. A facility may contain more than one generating unit of either the same or different type; (B) Generating unit is an individual electric generator and its associated plant and apparatus whose electrical output is capable of being separately identified and metered.</p>	<p>Staff is not opposed to this recommendation.</p> <p>If OPC’s suggestions regarding batteries is adopted, Staff recommends that throughout the rule the Commission use the term “energy storage system” and adopt the following definition:</p> <p>Energy Storage System is a system that is capable of absorbing energy, storing it, and dispatching the energy back into the bulk power system.</p>
Subsection (1)(B): (B) Capacity purchases of longer than seven (7) days’ duration;	<p><i>Receive all capacity purchases regardless of duration</i></p> <p>Capacity purchases, regardless of duration;</p>	<p>Staff does not object unless the utilities raise a significant concern at hearing.</p>
Subsection (1)(C): (C) Schedule of planned outages of power production facilities	<p><i>Add battery storage facilities</i></p> <p>Schedule of planned outages of power production facilities and battery storage facilities.</p>	<p>Staff does not object unless the utilities raise a significant concern at hearing.</p>
Subsection (1)(D): (D) Schedule of planned fuel test burns, unit heat-rate tests provided as a heat-rate curve, and accreditation runs with documentation of the results of all tests and runs;	<p><i>Split proposed subsection (1)(D) and various language changes</i></p> <p>Schedule of thermal generating unit planned fuel test burns heat-rate tests.</p> <p>Documentation of the results of all accreditation runs, fuel test burns, and heat-rate tests with a heat-rate curve included in heat-rate test documentation;</p>	<p>Staff notes that for the utility to develop a heat-rate curve a scheduled heat-rate test is not always necessary. The utility may develop a curve from its data historian. Staff further notes that this proposed requirement for heat-rate curves is intended to be different from the Fuel Adjustment Clause requirement for heat rate/efficiency testing.</p>

		<p>Additionally, if the Commission adopts OPC's recommendation to split proposed subsection (1)(D), Staff recommends the following edits:</p> <p>Schedule of planned fuel test burns heat-rate tests;</p> <p>Documentation of the results of all accreditation runs, fuel test burns, and heat-rate tests with a heat-rate curve included in heat-rate test documentation;</p>
n/a - add new requirement	<p><i>Adds new requirement</i></p> <p>Penalties incurred under a Regional Transmission Organization or an Independent System Operator Open Access Transmission Tariff, the reason for the penalty, and the expected remediation steps;</p>	<p>Staff does not object unless the utilities raise a significant concern at hearing.</p>
<p>Subsection (1)(F): (F) The terms of new contracts or existing contracts which will be booked to Accounts 310–346 or Accounts 502–546 of the FERC's Uniform System of Accounts requiring the expenditure by the electric utility of more than two hundred thousand dollars (\$200,000) including but not limited to contracts for engineering, consulting, rep repairs,</p>	<p><i>Recommends adding non-steam generation accounts 548-554</i></p> <p>The terms of new contracts or existing contracts which will be booked to Accounts 310–346, or Accounts 502–546, or Accounts 548-554 of the FERC's Uniform System of Accounts requiring the expenditure by the electric utility of more than two hundred thousand dollars (\$200,000) including, but not limited to, contracts for engineering, consulting, repairs, and modifications or additions to an electric plant; and</p>	<p>Staff notes the Commission may want to adopt the most recent version of the FERC Uniform System of Accounts in the future. Therefore, Staff proposes the following alternative language:</p> <p>The terms of new contracts or existing contracts which will be booked according to the FERC's Uniform System of Accounts as adopted by the Commission in 20 CSR 4240-20.030 requiring the expenditure by the electric utility of more than two hundred thousand dollars (\$200,000) including but not limited to contracts for engineering, consulting, rep repairs, and modifications or additions to an electric plant; and</p>

and modifications or additions to an electric plant; and		
<p>Section (2) Monthly Reporting of Hourly Data.</p> <p>(A) Every electric utility shall accumulate the information described below and submit it monthly in EFIS on the last day of the month following the month to be reported:</p> <p>....</p> <p>(B) The information in this section shall be provided in an electronic format from which the data can be easily extracted for analysis in spreadsheet or database software using the templates provided by the commission.</p>	<p><i>Moves language from proposed section (2)(B) up</i></p> <p>Every electric utility shall accumulate and report in an electronic format from which the data can be easily extracted for analysis in spreadsheet or database software using the templates provided by the commission the information described below and submit it monthly in EFIS on by the last day of the month following the month to be reported.</p>	<p>Staff prefers the proposed language. See Style Guide for Rule Writers.</p>
<p>1. All generating unit outages and derates for all units regardless of size, fuel type, or ownership share;</p>	<p><i>Adds dispatchability</i></p> <p>All generating unit outages and derates for all units regardless of size, dispatchability, fuel type, or ownership share;</p>	<p>Staff is not opposed to this recommendation.</p>
<p>New requirement</p>	<p>All outages and derates of battery storage facilities;</p>	<p>Section (2) of the proposed rule was written with consideration of the data needs for production cost modeling. While not opposed to</p>

		<p>incorporating battery energy storage systems that are interconnected at transmission, Staff is not aware of any currently in operation by the electrical corporations. The Commission reviews its rules on a 5-year cycle as required by section 536.175 RSMo. Staff recommends that additional requirements for storage could be re-evaluated in 2029 during the next periodic rule review.</p> <p>Electrical utilities report to NERC via the Generating Availability Data System (GADs). Energy storage is reported for systems co-located at wind or solar facilities. At this time, Staff is not aware of any of the electrical corporations operating battery energy storage systems co-located with its wind or solar facilities.</p> <p>GADs Wind Generation and GADs Solar Generation data reporting instructions effective January 1, 2024 outline performance records for energy storage relevant to OPC’s suggestion:</p> <ul style="list-style-type: none">• Availability status• Charge Generation (MWh)• Discharge Generation (MWh)• Charging Hours (number of hours)• Discharging Hours (number of hours)• Forced Outage Hours (number of hours)• Maintenance Outage Hours (number of hours)• Planned Outage Hours (number of hours)
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5. Hourly day-ahead load and real-time load at each load node;	<i>Adds hourly price data</i> Hourly day-ahead and real-time load and price at each load node;	Staff does not object unless the utilities raise a significant concern at hearing. Currently, Staff has access to S&P Global and is able to access price information and download this data. Staff notes this information is publicly available. MISO/SPP settlements occur intra-hourly and are subject to change for several months through the RTO settlement process.
n/a – new requirement	<i>Adds new requirement</i> Hourly day-ahead and real-time price for each generation node;	Staff does not object unless the utilities raise a significant concern at hearing. Currently, Staff has access to S&P Global and is able to access price information and download this data. Staff notes this information is publicly available. MISO/SPP settlements occur intra-hourly and are subject to change for several months through the RTO settlement process.
n/a – new requirement	<i>Adds new requirement</i> Hourly charge and discharge amounts of battery storage facilities;	See comments above regarding energy storage systems.
n/a – new requirement	<i>Adds new requirement</i> Hourly charge cost and discharge revenue of battery storage facilities;	See comments above regarding energy storage systems.
Section (2)(A)6. 6. Total load for each hour by—	<i>Adds “megawatt-hour”</i> Total megawatt-hour load for each hour by:	Staff is not opposed to this recommendation.
n/a – new requirement	<i>Adds new requirement</i>	Staff is not opposed to this recommendation but notes that proposed section (2) is intended to be limited to data that can be easily extracted for analysis in spreadsheet or database software.

	Any additional information that the commission has ordered the electric utility to provide in its monthly report.	
n/a – new requirement	<p><i>Adds new requirement</i></p> <p>If a utility provides notice of a generating unit retirement to a Regional Transmission Organization or an Independent System Operator, notice shall be provided to the commission within ten (10) business days of the notice to the Regional Transmission Organization or Independent System Operator.</p>	Staff is not opposed to this recommendation.
<p>Paragraph (3)(A)1:</p> <p>1. Details of any accident or event at a power plant involving serious physical injury or death or property damage in excess of two hundred thousand dollars (\$200,000);</p>	<p><i>Changes “power plant” to “facility”</i></p> <p>1. Details of any accident or event at any facility involving serious physical injury or death or property damage in excess of two hundred thousand dollars (\$200,000);</p>	Staff is not opposed to this recommendation.
<p>Paragraph (3)(A)3:</p> <p>3. Forced outages of any fossil-fuel fired generating unit(s) with an accredited capacity of greater than one hundred (100) megawatts that reasonably could be anticipated to last longer than three (3) days, when the unit(s) is forced out</p>	<p>Forced outages of any fossil-fuel fired generating unit(s) that reasonably could be anticipated to last longer than three (3) days, when the unit(s) is forced out due to a common or unforeseen occurrence;</p>	<p>Staff prefers its original language.</p> <p>All outages are reported after the fact in proposed paragraph (2)(A)1. The purpose of this requirement is to have timely information on outages that are likely to impact the electric corporation’s ability to provide service.</p>

<p>due to a common or unforeseen occurrence;</p>		
<p>Paragraph (3)(A)4:</p> <p>4. Forced outages of wind and solar generating plants when there is a loss of at least thirty percent (30%) of total installed capacity that reasonably could be anticipated to last longer than three (3) days, when the cause is due to a common or unforeseen occurrence;</p>	<p><i>Changes “generating plant” to “facility”</i></p> <p>Forced outages of wind and solar generating facilities when there is a loss of at least thirty percent (30%) of total installed capacity that reasonably could be anticipated to last longer than three (3) days, when the cause is due to a common or unforeseen occurrence;</p>	<p>Staff agrees with this recommendation.</p>
<p>Section (3) Incident Reporting.</p> <p>(A) Every electric utility shall report through EFIS by the end of the first business day following discovery of an incident the information described below:</p> <p>.....</p> <p>Paragraph (3)(A)5:</p> <p>5. Reductions of coal inventory below a thirty-(30-) day supply and reductions of oil inventory below fifty</p>	<p><i>Changes “normal oil inventory” to “storage capacity of that oil facility” and various language edits</i></p> <p>The coal inventory at a coal generating facility falls below a thirty (30)-day burn supply, and reductions of oil inventory at an oil facility falling below fifty percent (50%) of the storage capacity of that oil facility; and</p>	<p>OPC’s recommendation as written does not read as part of the overall list.</p> <p>Alternative language:</p> <p>5. Reductions of coal inventory below a thirty-(30-) day supply and reductions of oil inventory below fifty percent (50%) of the storage capacity of that oil facility; and</p>

<p>percent (50%) of normal oil inventory; and</p>		
<p>Section (4) Electrical Contact reporting.</p> <p>(A) Every electric utility and rural electric cooperative shall notify designated commission personnel by telephone or in writing by the end of the first business day following the discovery of any electrical contact, provided the utility or rural electric cooperative first has received proper notice or has actual knowledge of the electrical contact, as described below: (D) Contact information for designated commission personnel is included on the Missouri Public Service Commission Electrical Contact Reporting Form, incorporated by reference, as published by the commission, July 17, 2023, and provided on the</p>	<p><i>Moves proposed subsection (C) and (D) up. Notes two forms are currently posted on the website.</i></p> <p>(A) Electrical Contact Reporting. Electrical contact reporting shall be made through EFIS, in writing using the Missouri Public Service Commission Electrical Contact Reporting Form, incorporated by reference, as provided on the commission website (psc.mo.gov), or by phone to the commission personnel designated on the form.</p> <p><i>Notes the following subsection language is not needed if incorporated into section:</i></p> <p>Every electric utility and rural electric cooperative shall notify the commission by telephone by the end of the first business day following the discovery of any electrical contact, provided the electric utility or rural electric cooperative first has received proper notice or has actual knowledge of the electrical contact, described below:</p>	<p>Staff prefers the proposed language (see Style Guide for Rule Writers).</p> <p>In response to OPC’s note that there are two forms on the website, as previously recommended in Staff’s written comments, Staff recommends that the published date “July 17, 2023” be changed to “September 24, 2024”.</p>

commission website at psc.mo.gov.		
Rule effective date.	<i>Evergy estimates it needs three months to comply with the rule as proposed regarding the use of standard templates.</i>	<p>Staff notes that if the Commission files the final order of rulemaking on November 18, 2024 with Administrative Rules Division the rule will be published on January 29, 2025 and effective February 28, 2025. However, if the Commission files its final order of rulemaking on November 15, 2024 the rule will be published and effective one month earlier.</p> <p>Staff further notes that if Evergy requires a temporary variance to comply, it may file an application with the Commission after the rule becomes effective.</p>
<p>Paragraph (2)(A)6:</p> <p>6. Total load for each hour by—</p> <p>A. Wholesale load;</p> <p>B. Sale for resale load; and</p> <p>C. Retail load by—</p> <p>(I) Rate code if customers taking service on a rate code are metered at a consistent voltage; or</p> <p>(II) Rate schedule for each voltage of service offered within each rate schedule; and</p>	<p><i>Evergy notes:</i></p> <ul style="list-style-type: none"> • Evergy to only offer one month view of data (no historical data); • The month is a calendar view of data and does not tie to revenue month, billing details or revenue/usage for rate cases; • The hourly data will be provided by rate code as used in Evergy billing systems; and • The data set will not be stored by Evergy for future use or compares. It will be a once a month pull. 	<p>Staff understands that data will be submitted monthly and stored in EFIS (or downloaded by Staff).</p> <p>Staff understands that Evergy does not intend to store the data submitted for future use.</p>