

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Establishment of a Working)
Case Regarding the Membership of Missouri's)
Investor-Owned Electric Utilities in Regional)
Transmission Organizations)

File No. EW-2021-0104

ORDER DIRECTING COMMENTS

Issue Date: December 21, 2020

Effective Date: December 21, 2020

The Commission opened this file on October 14, 2020, as a working case to gather information about the benefits and costs of continued membership by Missouri's investor-owned electric utilities in regional transmission organizations. The Commission directed its Staff to prepare a report of its findings by June 30, 2021. On December 18, Staff filed a motion asking the Commission to direct Missouri's investor-owned electric utilities to answer a set of questions compiled by Staff. The Commission will do as Staff requests.

THE COMMISSION ORDERS THAT:

1. Union Electric Company d/b/a Ameren Missouri Evergy Metro, Inc., d/b/a Evergy Missouri Metro; Evergy Missouri West, Inc. d/b/a Evergy Missouri West; and The Empire District Electric Company d/b/a Liberty Utilities or Liberty shall answer the questions listed in Appendix A no later than February 16, 2021.
2. Any other stakeholder may respond to the questions listed in Appendix A no later than February 16, 2021.
3. This order shall be effective when issued.



BY THE COMMISSION

A handwritten signature in black ink that reads "Morris L. Woodruff". The signature is written in a cursive style.

Morris L. Woodruff
Secretary

Morris L. Woodruff, Chief Regulatory
Law Judge, by delegation of authority pursuant
to Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 21st day of December, 2020.

Appendix A

Questions for Utilities

RTO Benefits

- (1) For your utility, please identify and describe all direct and indirect benefits that your utility receives from RTO participation.
- (2) For each benefit, please identify the time period over which the utility expects to accrue those benefits. Additionally, please give the utility's best approximation of when each benefit will be experienced. If that benefit is expected to increase or decrease annually over time, please explain what changes would cause the benefit to change.
- (3) For each benefit, please identify whether or not this benefit can be quantified.
 - a. Can the quantifiable benefits be measured or valued over a certain timeframe?
 - b. Please identify any discount rates used for measuring future benefits or likelihoods if scenario planning is involved.
- (4) For each quantifiable benefit, has the utility quantified those benefits since the utility began participation in the RTO? Why or why not? Additionally, please explain how the utility has quantified those benefits, provide any/all workpapers that calculated these benefits, and provide the cost of gathering, analyzing, and interpreting such information.
 - a. Have any measurable benefits factored into the utility's business plan or performance metrics?
- (5) Please identify how the utility would ideally quantify future benefits of RTO participation. Please provide the cost of gathering, analyzing, and interpreting such information under the ideal scenario. If such information is not reasonably and economically available, what kind of information would the utility propose as a proxy? Please provide the cost of gathering, analyzing, and interpreting such proxy information.
 - i. What will drive these future benefits?
 - ii. Are there any existing benefits that will be eliminated based on upcoming or expected changes at the RTO?
- (6) For each benefit of RTO participation that is not quantifiable, please explain why it is not quantifiable.
- (7) For each non-quantifiable benefit, has your utility placed a monetary value on the benefit? If so, please explain how the monetary value was derived, and provide the cost of gathering, analyzing, and interpreting such information.
- (8) Does your utility receive an adder from FERC for any of its RTO participation? What is the monetary value of those adders?
- (9) How many FTE are there in your utility whose positions solely or mostly involve working with or monitoring or reporting data to the RTO? What is the cost of those positions or the parts that deal only with the RTO? What is the overall ancillary support

budget to maintain these positions? Do you expect the number of employees and the budget in this area to increase over time? Why?

- a. Please estimate how the employment needs would change absent RTO membership.

RTO Costs

- (1) For your utility, please identify and describe all costs that your utility incurs from RTO participation.
- (2) For each cost, please identify the time period over which the utility expects to incur those costs. Additionally, please give the utility's best approximation of when each cost will be experienced. If that cost is expected to increase or decrease annually over time, please explain what changes would cause the cost to change.
- (3) For each cost, please identify whether or not this cost can be quantified.
- (4) For each quantifiable cost, has the utility quantified those costs since the utility began participation in the RTO? Why or why not? Additionally, please explain how the utility has quantified those costs, provide any/all workpapers that calculated these cost, and provide the cost of gathering, analyzing, and interpreting such information.
- (5) Please identify how the utility would ideally quantify future costs of RTO participation. Please provide the cost of gathering, analyzing, and interpreting such information under the ideal scenario. If such information is not reasonably and economically available, what kind of information would the utility propose as a proxy? Please provide the cost of gathering, analyzing, and interpreting such proxy information.
 - i. What will drive these future costs?
 - ii. Are there any existing costs that will be eliminated based on upcoming or expected changes at the RTO?
- (6) For each cost of RTO participation that is not quantifiable, please explain why it is not quantifiable.
- (7) For each non-quantifiable cost, has your utility placed a monetary value on the cost? If so, please explain how the monetary value was derived, and provide the cost of gathering, analyzing, and interpreting such information. - What have been the total cost of the RTO overheads allocated to the utility the past 3 years on an annual basis? What specific benefits are provided for those costs?
- (8) What would be the cost of exiting an RTO? Are offsets to these costs possible? Please provide in graph form if possible from the date your company entered the RTO and the date at which the RTO mandated an exit fee (if these dates are not the same please explain) on a yearly basis the cost of what an exit fee would have been if your company had exited the RTO versus what the estimated benefits received were for those same years.

RTO Benefit-Cost Study Period

As of now, when would your utility anticipate conditions being favorable to performing a benefit cost study? What would the time period be for that analysis? Please explain what changes to current conditions result in that period being selected. Additionally, are there identifiable events or categories of events that would result in that period being moved forward or back? Please identify and explain.

Is there value in the Commission maintaining the conditions in prior orders for utilities to provide benefit-cost studies? What if anything do other states in which a utility or its affiliates operate require for a comparable review?

Question for all Stakeholders

RTO Withdraw Events

Are there any identifiable “deal breaker” events or categories of events that would make it unreasonable for a Missouri investor-owned utility to remain in their current RTO? If so, please identify the event or category of events. Please provide a recommendation for how to analyze the costs and benefits for each event or category of events.


STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

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 21st day of December, 2020.**




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

December 21, 2020

File/Case No. EW-2021-0104

**Missouri Public Service
Commission**

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

Sincerely,



**Morris L. Woodruff
Secretary**

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