

In the Matter of The Revision of Commission's Rules Regarding Gas Utilities

GX-2018-0390 VOL 1

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In The Matter Of The Revision)
Of The Commission's Rules) File No. GX-2018-0390
Regarding Gas Utilities)

RONALD D. PRIDGIN, Presiding
DEPUTY CHIEF REGULATORY LAW JUDGE

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P R O C E E D I N G S

JUDGE PRIDGIN: Good morning. We are on the record. This is the rulemaking hearing in Commission File No. GX-2018-0390 In The Matter Of The Revision Of The Commission's Rules Regarding Gas Utilities. I'm Ron Pridgin. I'm the Regulatory Law Judge assigned to run this rulemaking hearing that's being held on February 6, 2019, in the Governor Office Building in Jefferson City, Missouri. The time is 11:00 a.m.

Just to clarify, these proposed rules are the Commission's Chapter 3 rules. The Commission proposes to rescind Rule 235, 260 and 275, and then promulgate rules in its Chapter 40 Rules 085 and 090. We do have some written comments from some parties. Thank you for those comments. The purpose of this hearing is to receive any additional oral comments from anyone who wishes to comment.

Before we proceed with that, just a reminder this is a noncontested case. So people who wish to speak do not have to be represented by counsel. I will ask if counsel -- of anyone who wishes to enter an appearance before we proceed any further. Let me start with Staff, please?

MR. BERLIN: Thank you, Judge. Robert S. Berlin appearing on behalf of the Staff of the Missouri

1 Public Service Commission located at the Commission's
2 Jefferson City offices, and the court reporter has my
3 contact information. I would point out that Staff
4 witness Jamie Myers is with me today and would like to
5 make some comments and some responsive comments
6 regarding the proposed rulemaking.

7 JUDGE PRIDGIN: Mr. Berlin, thank you. Any
8 entry of appearance on behalf of the Office of the
9 Public Counsel?

10 MR. HALL: Thank you, Your Honor. Caleb Hall
11 on behalf of the Office of the Public Counsel. My
12 contact information has been provided to the court
13 reporter. Although not in the room at this time, OPC
14 witness John Robinett is available for questions should
15 the Commission have any regarding any of our comments
16 today.

17 JUDGE PRIDGIN: Mr. Hall, thank you. Any
18 entry of appearance on behalf of Ameren Missouri?

19 MS. JOHNSON: Yes, Your Honor. Paula Johnson
20 on behalf of Union Electric Company doing business as
21 Ameren Missouri. I believe the court reporter has my
22 contact information. I can recite it just in case.

23 JUDGE PRIDGIN: That's up to you. It's not
24 necessary. It's up to you.

25 MS. JOHNSON: I think the fewer I speak the

1 happier people are.

2 JUDGE PRIDGIN: Very good. Ms. Johnson, thank
3 you.

4 MS. JOHNSON: Thank you.

5 JUDGE PRIDGIN: I don't think I see anybody
6 else in the room. But just to be sure, anybody else
7 wishing to enter an appearance?

8 All right. Hearing none, let's proceed with
9 written comments -- or excuse me, with oral comments and
10 I believe we'll go in the same order I just went with
11 Staff, Public Counsel, Ameren Missouri, and then we'll
12 see if anybody else has any comments. Staff, any oral
13 comments in addition to the written comments?

14 MS. MYERS: Yes, Judge. My name is Jamie
15 Myers. I'm the Commission Staff Deputy Director. First
16 of all, I'd like to thank the Office of the Public
17 Counsel and Ameren Missouri for filing comments. I'll
18 be providing a response to both of their comments, and
19 I'll start with OPC's first.

20 So in addition to the comments that Staff
21 filed and we filed in support of promulgating the new
22 Rule 40.090, as well as provided two comments on the
23 promulgation of the Rule 40.085, and we suggested
24 deleting some extraneous language. Again, some of those
25 ideas have come from the other two recent rulemakings.

1 So I guess as a precursor to my responses I would
2 suggest that as the Commission takes into consideration
3 the comments today I'd also like the Commission to take
4 into consideration any comments and decisions made in
5 the AX-2018-0395 rulemaking, as well as EX-2018-0389
6 just to make sure that the language is consistent. I
7 know recommendations have been made in all of those
8 cases.

9 So first starting with OPC, they filed a
10 comment suggesting deleting some language from 40.090.
11 OPC's suggestion is to delete (1)(B)1, and I agree with
12 that suggestion. It would delete some unnecessary
13 dates. Those dates have all passed. By my read, it's
14 no longer necessary to include those dates.

15 On page 3 of OPC's comments, they have the
16 language that would remain. So we would renumber (B)2
17 and 3 so it would become (1)(B)1, (1)(B)2 just as
18 proposed on page 3 of OPC's comments.

19 Also as a general statement to OPC's remark
20 about expressing some what I would guess is concern
21 about the fact that, you know, a lot of the gas
22 utilities filing requirements are in Chapter 40 where we
23 still have some filing requirements for electric in
24 Chapter 3. Our thoughts as we move forward in this
25 process is we will have yet another -- one more

1 rulemaking to do some cleanup to remove some other
2 things in Chapter 3 that Staff views doesn't need to be
3 in Chapter 3. So we'll be removing a lot more filing
4 requirements for electric utilities as well as steam
5 heat and water and sewer. So those would go into their
6 respective chapters, 20 for electric, 80 for steam heat,
7 50 and 60 for water and sewer and anything left in
8 Chapter -- that would need to go to Chapter 40 for gas.

9 I will say there will be an additional
10 rulemaking or two to kind of take care of that last
11 cleanup thing. So we've seen along the process.

12 Moving on to Ameren's comments. So Ameren
13 Missouri, their first specific comment by my read starts
14 on page 2, paragraph 6. It talks about removing some
15 tariff filing references, things like that, as well as
16 the Form 14. Staff is okay with removing these Form 14
17 references. I do think leaving in references to title
18 pages is necessary. But other than that, I think we can
19 remove any reference to looseleaf as well as the Form
20 14.

21 And again, I think if the Commission takes
22 notes of those other two rulemakings here again this
23 language would be consistent with what's being done on
24 the electric side as well, whether we go with language
25 that says published or available. I think whatever the

1 Commission decides to do on the electric side should
2 also be done here on the gas side for that sort of
3 language and what is in EFIS versus what is publicly
4 available in a hard document.

5 And then moving on to page 4, again these
6 comments Ameren filed here are very similar to what they
7 filed in the EX-2018-0389 case. Again, Staff is
8 suggesting that they should still make copies available
9 to those who request a copy of a tariff to review it.
10 So whatever decision the Commission makes on the
11 electric side we would say should also be consistent
12 here on the gas side.

13 I will also note, and Ms. Johnson please
14 correct me if I'm wrong, but I believe on the electric
15 rules Ameren Missouri was suggesting that the word less,
16 and you will find that here in the middle of subsection
17 (4) (100) words or less. I believe Ameren Missouri was
18 suggesting that that word should be changed to fewer on
19 the electric side.

20 MS. JOHNSON: That is correct. I missed that
21 this time. Thank you.

22 MS. MYERS: That's okay. And we would be fine
23 with that change here as well. We just wanted to be
24 consistent.

25 And so moving on to page 5, again this

1 subsection (24), again I feel like I sound like a broken
2 record, but whatever the Commission decides to do on the
3 electric side I would say the language here should be
4 consistent. So from Staff's perspective we think the
5 rule still needs to contemplate both electronic filing
6 as well as mailed filing or in person filing and it
7 should be free from all charges or claims for postage.

8 And we do not agree with the insertion of the
9 language in the middle of that section that talks about
10 unless a server error or other similar error is
11 determined by the Commission to have happened through
12 EFIS.

13 And I think that addresses all the substantive
14 comments that have been filed. I can answer any
15 questions if there are any.

16 JUDGE PRIDGIN: I think the only question I
17 have, could you go over those case numbers again that
18 you had mentioned. I think I got them. I want to be
19 sure. You kept referring to your wish that the
20 Commission would be consistent with a couple other
21 rulemakings.

22 MS. MYERS: Correct.

23 JUDGE PRIDGIN: Could I get you to repeat
24 those, please?

25 MS. MYERS: Absolutely. We have EX-2018-0389.

1 JUDGE PRIDGIN: Okay.

2 MS. MYERS: And AX-2018-0395.

3 JUDGE PRIDGIN: Thank you. I think those are
4 all the questions I have. Thank you very much, Ms.
5 Myers. Anything further from Staff?

6 MS. MYERS: No, that's all.

7 JUDGE PRIDGIN: Thank you. Let me proceed to
8 Office of the Public Counsel. Mr. Hall, I don't want to
9 limit your comments at all. At a minimum if you could
10 address I guess any objections or responses you might
11 have to Staff's written comments and to Ameren
12 Missouri's written comments and obviously anything else
13 you'd like to say as well.

14 MR. HALL: Sure, Your Honor, thank you for
15 this time to comment on these rule revisions. From
16 Staff's comments, it's apparent that there is a warm
17 reception to some of the comments offered by Public
18 Counsel's rules which should limit our response at this
19 time. Our filed comments were limited to three main
20 points. One, a suggestion of removal of extraneous
21 language. Two, if that removal is not done, a notice
22 should be -- the Commission should be on notice that
23 there is a hanging reference to an existing rule that
24 may need to be modified in a further docket. And three,
25 that a possible revision be done regarding the filing of

1 depreciation studies.

2 We do have a brief comment to what Ameren
3 filed. As for the removal of extraneous language, we
4 are glad that Staff agrees with Public Counsel's
5 position. This then addresses our second point that the
6 reference to Chapter 240 -- sorry, 4 CSR 240-3.175
7 within this proposed rule for the submission of gas
8 depreciation studies, that will be taken out so that
9 does not need to be addressed in a further docket.

10 We're not faulting Staff at this time for like
11 doing Staff rule revisions in piecemeal. This is going
12 to be a long process and we understand that. We just
13 wanted all parties to be aware that that was there if
14 that was reprinted in the future that would have to be
15 addressed again.

16 I do not believe our third point needs to be
17 addressed at this time. As for Ameren Missouri's --
18 without getting into Ameren Missouri's specific
19 language, a lot of their comments seem to be rooted at a
20 general suggestion that tariff schedules and filings
21 need not be available in a hard copy format at Ameren's
22 business locations. In prior hearings, Public Counsel
23 has generally concurred but suggested that it still be
24 required.

25 At this time we would like to slightly modify

1 our position in that we do not oppose Ameren Missouri's
2 suggestions. However, if the Commission does move
3 forward in a more electronic based regulatory format, we
4 suggest that companies be held to a higher standard of
5 keeping updated tariffs and schedules available on their
6 website. Without pointing to any one particular
7 utility, in our experience we have found that we have
8 seen rate schedules and tariffs that are like six months
9 out of date that still remain on utility websites.
10 That's all the comments I have at this time unless you
11 have any further questions.

12 JUDGE PRIDGIN: I think the only question I
13 have, Mr. Hall, is can I get you to clarify exactly what
14 OPC does not oppose that was contained in Ameren's
15 written comments. I want to be sure I understand.

16 MR. HALL: Sure.

17 JUDGE PRIDGIN: Is that just keeping tariffs
18 at all their business locations? Is that the comment?

19 MR. HALL: Yes, mostly. Specifically Ameren
20 Missouri has offered some revisions on page 3 of their
21 filing and elsewhere Ameren Missouri has made other
22 necessary changes where they find it prudent to coincide
23 with the changes on page 3. We are not saying that we
24 support them, but our office is no longer in opposition.

25 JUDGE PRIDGIN: Very good. Thank you.

1 Anything further from Public Counsel?

2 MR. HALL: Not at this time, Your Honor.

3 JUDGE PRIDGIN: Thank you. Ms. Johnson,
4 again, I want to give you the freedom to make whatever
5 comments you want, but I would ask at a minimum if you
6 could please address Public Counsel's and Staff's
7 written comments.

8 MS. JOHNSON: Certainly. Thank you, Your
9 Honor.

10 JUDGE PRIDGIN: Thank you.

11 MS. JOHNSON: Before I do, I just -- and if
12 you read the other transcripts you'll see that this is
13 also fairly consistent. I want to thank Staff for all
14 the work they've been doing on consolidating the
15 tariffs. This has been a great initiative and we're
16 very appreciative of their efforts to get a good logical
17 construct for all these filing requirements. It's going
18 to be very helpful.

19 I will be reiterating some of my comments from
20 the other two hearings that Ms. Myers referenced. I
21 will try to keep those short so I don't just keep
22 repeating the same things over and over, but I also want
23 to note that we are okay with the changes recommended by
24 the OPC in their comments. So we don't object to that
25 kind of simplification of that requirement.

1 As far as our further recommendations, I'll
2 just address the changes in language that we hope to
3 bring things up even more to how the current practice
4 actually operates. I believe I highlighted it in these
5 comments also. But when I consulted with our security
6 staff at the GOB, no one had any recollection of anyone
7 actually coming to the offices to request a hard copy of
8 the tariffs. When people do go for the tariffs, they
9 tend to go to the website. They'll call our customer
10 service representatives. And most of that interaction
11 is electronic. So we think that having that -- having a
12 printed copy hasn't provided as much value as keeping
13 our tariffs updated on the website to make sure people
14 are getting the most information that way.

15 So that's one reason why we think having the
16 printed copies doesn't necessarily make sense. We
17 realize that that is for us and if there are other
18 utilities that are finding that valuable. I believe we
19 discussed some potential compromise language in the
20 prior rulemakings that would just reference published or
21 some similar terminology whether that be electronic
22 publishing or hard copy publishing. I think it might
23 have been at a different circumstance than this one.
24 But if there was just language like that that would not
25 necessarily -- our preference would be having the option

1 to go all electronic if necessary. If that's not an
2 option, we will obviously comply. We think that
3 provides the best value to our customers, especially
4 given the security concerns and granting access to
5 certain facilities.

6 Moving to our comment on page 4, kind of along
7 those lines we do mention that we would still have the
8 tariff available upon request. That availability may be
9 electronic. I think that was a pretty general statement
10 in that paragraph in particular. So whether a company
11 chooses to have that electronic or in a hard copy, we
12 hope that would be an option, but again whatever the
13 Commission ultimately decides is appropriate we will
14 abide by.

15 Moving to the notations on page 5, and I will
16 defer to Jamie later also to make sure I haven't
17 misstated something from one of the other rulemakings or
18 accidentally overimplied that something applied more
19 than it actually does. I want to make sure I don't
20 accidentally step on last week's toes.

21 But I think I did try to make a few more
22 refinements to this language based on the discussions
23 last week to state that the filings could be completed
24 either by mail or through the electronic filing system.
25 Just kind of whichever way the company deems more

1 appropriate. I did include the free from all charges
2 and claims for postage language per statute request
3 because we understand while we do a lot of our filing
4 electronically that may not be the case for every
5 utility.

6 I do think that there is some value in having
7 some protection language if for some reason we are not
8 able to complete a filing on a required date that we do
9 and it's not because of a fault in our system. If it's
10 a fault in our system, we own that. We will find
11 another law firm or some way to get the filing done.

12 If it's not a fault on our system that EFIS
13 isn't working, we would like some availability, some
14 wiggle room to be able to provide some kind of notice
15 that we're not going to be able to meet the deadline
16 because of a server similar error. That language if
17 there's a better way to phrase that we are open to that,
18 but we would like to have some kind of accountability if
19 we're using the electronic filing method to be able to
20 delay it if there's a non company issue with getting
21 that filing accomplished.

22 I believe that's all I have to say. Again,
23 we're appreciative of this process and we look forward
24 to seeing how the rest of the rulemakings shape out over
25 time. I know it's a heck of an effort. We're glad to

1 see where this is going. Thank you.

2 JUDGE PRIDGIN: Ms. Johnson, thank you. I
3 don't think I have any questions. Anything further from
4 Ameren Missouri?

5 MS. JOHNSON: Nothing further. Thank you,
6 Your Honor.

7 JUDGE PRIDGIN: Thank you. And I don't see
8 anyone else in the room. Just in case, is there anyone
9 else who wishes to make a comment? Hearing nothing, is
10 there anything further from anyone else before we go off
11 the record? Going once, going twice. All right. Thank
12 you very much. That adjourns today's rulemaking hearing
13 in GX-2018-0390. We're off the record.

14 (Off the record.)
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