

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

In the Matter of the Revisions of the
Commission's Rules Regarding Gas
Utilities

)
)
)

Case No. GX-2018-0390

STAFF'S COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission and submits,
for the Commission's consideration, the attached comments.

Respectfully submitted.

/s/ Robert S. Berlin

Robert S. Berlin
Missouri Bar Number 51709
Deputy Staff Counsel

Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
(573) 526-7779
(573) 791-9285 FAX
bob.berlin@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served, either electronically or by First Class United States Mail, postage prepaid, upon all parties or their representatives according to the Service List maintained by the Commission's Data Center, on this 1st day of February, 2019.

/s/ Robert S. Berlin

Case No. GX-2018-0390

Comments of the Staff of the Missouri Public Service Commission

As part of its review of Commission rules in compliance with Executive Order 17-03, Staff recommended rescission of certain duplicative requirements in Chapter 3 and promulgation of new rules in Chapter 40 to consolidate requirements. These changes are designed to streamline, simplify, and improve the user-friendliness of Commission rules.

Staff supports the proposed rescissions:

- 4 CSR 240-3.235 Filing Requirements for Gas Utility General Rate Increase Requests
 - Consolidation – moving to Chapter 40
- 4 CSR 240-3.260 Filing Requirements for Gas Utility Rate Schedules
 - Consolidation – moving to Chapter 40
 - Simplification – require one (1) copy, instead of fourteen (14)
- 4 CSR 240-3.275 Submission Requirements for Gas Utility Depreciation Studies
 - Consolidation – new rule in Chapter 40

Staff supports the proposed rule:

- 4 CSR 240-40.090 Submission Requirements for Gas Utility Depreciation Studies
 - Consolidation – streamlines filing requirements from Chapter 40

Staff recommendation with regard to 4 CSR 240-40.085:

Staff supports the proposed rule, 4 CSR 240-40.085 Filing Requirements for Gas Utility Rate Schedules, but recommends the following deletions,

1. In (3), ~~in duplicate if receipt is desired,~~
2. In (6), ~~No consideration will be given to telegraphic notices in computing the thirty (30) days' notice required.~~