# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

The Manager of the Manufactured Homes and Modular Units Program of the Missouri Public Service Commission,	) ) )
Complainant,	)
v.	) <u>Case No. MC-2020-0135</u>
Charles W. Brune and Anna G. Brune d/b/a Brune Mobile Sales,	) ) )
Respondents.	)

## RESPONSE TO OCTOBER 1, 2020 ORDER REGARDING CONFIDENTIAL INFORMATION

**COMES NOW** the Manager of the Manufactured Homes and Modular Units Program of the Missouri Public Service Commission ("Manager"), through counsel, and responds to the Commission's October 1, 2020 order regarding the confidentiality of information in the *Stipulation and Agreement* ("Stipulation") filed July 23, 2020.

Commission Rule 20 CSR 4240-2.135(2)(A)<sup>1</sup> lists the types of information that may be designated as confidential without first obtaining a protective order. This case involves five sets of consumers who purchased manufactured homes from Respondents.

<sup>&</sup>lt;sup>1</sup> 20 CSR 4240-2.135(2) states as follows:

<sup>(2)</sup> Confidential Designation.

<sup>(</sup>A) Any person may submit to the commission without first obtaining a protective order, information designated as confidential if that information is –

<sup>1.</sup> Customer-specific information;

<sup>2.</sup> Employee-sensitive personnel information;

<sup>3.</sup> Marketing analysis or other market-specific information relating to services offered in competition with others:

<sup>4.</sup> Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;

<sup>5.</sup> Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;

<sup>6.</sup> Strategies employed, to be employed, or under consideration in contract negotiations;

<sup>7.</sup> Relating to the security of a company's facilities; or

<sup>8.</sup> Concerning trade secrets, as defined in section 417.453, RSMo.

The homeowners' names, addresses, and home serial numbers are personal, customer-specific information that should be designated as confidential pursuant to 20 CSR 4240-2.135(2)(A)1. The homeowners' names, addresses, and home serial numbers are listed in paragraphs 2 through 6 and 12 through 15, including footnote 1, of the Stipulation.

If the proposal in this Response is granted, Staff will provide the Commission with a version of the Stipulation and Agreement with the information identified above redacted using the Redact feature of Adobe Acrobat.

WHEREFORE, Staff submits its Response to the Commission's October 1, 2020

Order Regarding Confidential Information for the Commission's consideration and information.

Respectfully submitted,

#### /s/ Karen E. Bretz

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been electronically mailed to all parties and/or counsel of record on this 7th day of October, 2020.

**Is/ Curtis Stokes**