

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

In the Matter of the Proposed Amendments)	
Of the Missouri Public Service Commission's)	MX-2016-0317
Rules Relating to Manufactured Housing)	

COMMENTS OF THE OFFICE OF THE PUBLIC COUNSEL

COMES NOW the Office of the Public Counsel ("OPC") and offers the following comments:

1. OPC's first comment is that, in MW-2016-0163, Staff's draft rules contemplated amendments to 4 CSR 240-123.095 which do not appear in the current case. Four CSR 240-123.090 has been filed twice, and 4 CSR 240-123.095 has not been filed in the current case. OPC believes that 4 CSR 240-123.095 may have inadvertently been omitted from MX-2016-0317 and 4 CSR 240-123.090 may have inadvertently been duplicated in MX-2016-0317.
2. OPC's second comment is that 4 CSR 240-123.050(2) should include a length of time to create uniformity in record-keeping requirements throughout the rules. Other amended rules, like 4 CSR 240-123.060 create a requirement to keep records for no less than five (5) years.
3. OPC's third comment is that, for 4 CSR 240-120.011, OPC proposes that the term "Chapter 127" be clarified as the administrative rule chapter rather than as a statutory chapter. This same clarification could be made for amended rule 4 CSR 240-121.010, 4 CSR 240-123.010, 4 CSR 240-124.010, 4 CSR 240-125.010, and 4 CSR 240-

126.010. Four CSR 240-127.010 could be clarified similarly – but extended to the other chapters listed.¹

WHEREFORE, the Office of the Public Counsel respectfully submits these comments.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

On September 15, 2017, I hereby certify that a true and correct copy of the foregoing motion was submitted to all relevant parties by depositing this motion into the Commission's Electronic Filing Information System ("EFIS").

/s/Ryan Smith

¹ Rule Manual, <https://www.sos.mo.gov/CMSImages/AdRules/main/manual/500RuleManual.pdf> (Statutes are cited as ... Chapter 536, RSMO 2016 ... but administrative rules are cited to using the full citation, for example, 25 CSR 15-5.025).