

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

In the Matter of a Working Docket)	
Regarding a Proposed Residential)	
Customer Disconnection Data)	Case No. AW-2020-XXXX
Reporting Rule)	
)	

**MOTION TO OPEN A WORKING GROUP DOCKET REGARDING A
PROPOSED RESIDENTIAL CUSTOMER DISCONNECTION DATA
REPORTING RULE**

COMES NOW the Office of the Public Counsel (“OPC”) and for its *Motion to Open a Working Group Docket Regarding a Proposed Residential Customer Disconnection Data Reporting Rule*, states as follows:

1. Based on extensive investigation, the OPC has determined that there presently exists significant problems with the data related to customer disconnections that is currently available for nearly all major public utility providers in the State of Missouri. A detailed account of these problems is set forth in a memorandum prepared by the OPC’s Chief Economist Dr. Geoff Marke and Public Utilities Accountant Amanda Conner, which has been attached to this motion as **Appendix A** and is incorporated herein by reference.

2. Many of the problems identified by the OPC are issues that were also identified in the *Resolution on Best Practices in Data Collection Reporting for Utility Services Delinquencies in Payments and Disconnections of Service* passed by the National Association of Regulatory Utility Commissioners’ Committees on Consumers and the Public Interest and Adopted by the National Association of

Regulatory Utility Commissioners' Board of Directors on November 19, 2019, which has been attached to this motion as **Appendix B** and is incorporated herein by reference.

3. In an attempt to proactively rectify these problems, the OPC has developed a proposed rule intended to establish standardized reporting requirements for utilities to facilitate proper data collection regarding residential customer service disconnection policies and practices. A copy of the OPC's proposed rule has been attached to this motion as **Appendix C** and is incorporated herein by reference.

4. Despite having drafted a proposed rule, the OPC has decided not to request a formal rulemaking docket pursuant to Commission Rule 20 CSR 4240-2.180 at this time, because the OPC believes that it would be more prudent to first engage in a dialogue with interested stakeholders in the course of a Commission overseen working group docket.

5. To that end, the OPC requests that the Commission open a working group docket to review the OPC's proposed rule and discuss any other concerns related to the collection and aggregation of customer disconnection data.

6. The OPC further requests that the Commission adopt the following procedural schedule for this working group docket:

1. December 30, 2019
 - a. Deadline for stakeholder comments to be filed in EFIS.
 - b. These comments should address the OPC's proposed rule as well as any other pertinent concerns regarding disconnection data collection and should also include the stakeholder's position on what chapter a rule on this issue would best be included in.

2. February 3, 2020
 - a. Workshop to discuss disconnection rules.
 - b. The OPC would also offer January 9, 10, 13, 14, and 17 or February 10 and 26 as alternative dates for which room 407 is presently available.
3. March 17, 2019 (or earlier)
 - a. Workshop closed and formal rulemaking procedure initiated by the OPC.

WHEREFORE, the Office of the Public Counsel respectfully requests the Commission establish a working group docket to review the OPC's proposed rule and discuss any other concerns related to collection and aggregation of customer disconnection data and adopt the proposed procedural schedule for said working group docket as set forth herein.

Respectfully submitted,
OFFICE OF THE PUBLIC
COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this twenty-fifth day of November.

/s/ John Clizer