

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

FILED

FEB 03 2003

Missouri Public
Service Commission

In the Matter of the Office of the Public Counsel's)
Petition for Promulgation of Rules Relating to)
Disclosure of Information and Customer Notices)
Relating to Changes in Rate Schedules and)
Terms and Conditions of Service for)
Telecommunication Companies.)

Case No. TX-2003-0237

**PUBLIC COUNSEL'S SUPPLEMENT AND AMENDMENT TO RULEMAKING
PETITION RELATING TO FISCAL NOTE ESTIMATES**

The Office of the Public Counsel (Public Counsel) respectfully amends its Rulemaking Petition and submits its estimation of the effect of the rulemaking on private persons or entities with respect to required monetary expenditures or reduction in income to form the basis of a fiscal note in compliance with the Order Directing Filing of January 21, 2003 and 4 CSR 240-2.180(3)(A)(5).

1. Public Counsel's Chief Public Utility Accountant has estimated that the effect of the proposed rule would result in de minimus additional expenditures for private persons and entities and there should be no reduction in income due to the proposed rule.

2. The present rule already requires the utility to file a brief summary of 100 words or less of the effect of the change in the proposed tariff on customers. (See, Rule 4 CSR 240-30.010, Rate Schedule (25).

3. The proposed rule does not add the filing of a new document, but only identifies specific information to include in the customer impact summary to make it more meaningful and informative. The minimal information called for in the rule amendment includes the name of the product or service, identification of the change in terms conditions or rates, the current rate, the new proposed rate, whether it was an

increase or decrease in rates, and the change in dollar amount and percentage. (Public Counsel's Petition, Paragraph 3).

The information the proposed rule requires is information that the company should have readily available as part of the company's own tariff review process developed in preparation of its proposed tariff. The only cost to the filing company would be the minor clerical costs to include the existing data in the summary. To be a meaningful summary, this elementary information should have been standard content under the existing rule. It could be argued that there would be no additional cost. However, at best there is only minor clerical costs.

4. The proposed rule also requires the attachment of a copy of any customer notice the company sent or is required to send to customers. Once again the additional cost of providing a copy is de minimus. This does not require a new notice be sent, but only has the company filing a copy of the notice it already is required to send or it has sent.

5. Public Counsel's rule proposal may reduce the time and costs of the Staff, Public Counsel and other persons and entities who review the tariffs. The required customer impact statement will provide relevant and material specific data that will assist in understanding the tariff by clearly identifying the before and after rates, the percentage change, and the other changes made in the tariff.

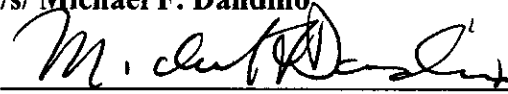
6. Upon information and belief, Public Counsel estimates that the additional costs or loss of income due to the proposed rule amendment would be less than \$500 in the aggregate for state agencies and political subdivisions and would not cost affected private entities more than \$500 in the aggregate.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Michael F. Dandino

BY:

A handwritten signature in dark ink, appearing to read "M. F. Dandino", written over a horizontal line.

Michael F. Dandino (Bar No. 24590)

Senior Public Counsel

P. O. Box 7800

Jefferson City, MO 65102

Telephone: (573) 751-5559

Facsimile: (573) 751-5562

Email: mdandino@ded.state.mo.us


VERIFICATION

COMES NOW Michael F. Dandino, Senior Public Counsel, Office of the Public Counsel, and being of lawful age and first having been duly sworn states that the facts and cost estimates set forth in this Supplemental Petition are true, accurate and correct to the best of his information, knowledge, and belief.


Michael F. Dandino

Sworn to and subscribed by me a notary public this 3rd day of February, 2003

KATHLEEN HARRISON
Notary Public - State of Missouri
County of Cole
My Commission Expires Jan. 31, 2006


Kathleen Harrison

My Commission expires January 31, 2006.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed or hand delivered this 3rd day of February, 2003 to the attached service list:

Dana K. Joyce
General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

A handwritten signature in black ink, appearing to read 'D. K. Joyce', is written over a horizontal line.