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November 1, 1999

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**FILED**

NOV - 1 1999

Missouri Public  
Service Commission

**Re: Case No. AX-2000-116**

Dear Mr. Roberts:

The Office of the Public Counsel makes the following comments on the proposed revision to the Commission rules:

**4 CSR 240-2.080 Pleadings, Filing & Service**

1. (7) Public Counsel supports this restatement of the general ethical responsibilities of counsel.
2. (8) &  
(10) Public Counsel supports the reduction in the number of copies filed with the PSC.
3. (16) OPC supports the reduction of the response time from 10 to 7 days provided, however, that the service by mail provision in the Missouri Rules of Civil Procedure are added so that if mailed 3 days are added to the time in which a response is due.
4. (17) In the rule for motion for expedited treatment, OPC suggests that the application should also disclose any negative effect the request may have on the customers or the public. The "attestation" should be changed to a "statement in the pleading" by the moving party "or counsel."

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5. (18) Methods of service

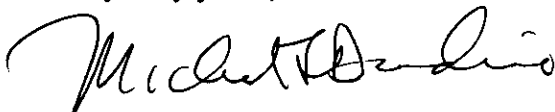
OPC recommends that service by fax or by electronic mail be added to delivery to the party's attorney of record (or the party if there is no counsel of record).

Service should be to the attorney of record if there is an attorney.

Service by mail should also provide that 3 days are added to time for response.

We have enclosed the original and fourteen copies for filing with the Commission.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Michael F. Dandino".

Michael F. Dandino  
Senior Public Counsel

MFD:kh

cc: Counsel of record