

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

In the Matter of a Request for a Waiver from )  
Commission Rule 20 CSR 4240-125.040(1)(C) ) **File No. MX-2020-0357**

## **STAFF COMMENTS TO PROPOSED AMENDMENT**

**COMES NOW** the Manager of the Manufactured Housing and Modular Units Program of the Missouri Public Service Commission (“Manager”), through counsel, and states:

1. Staff supports the proposed amendment to 20 CSR 4240-125.040(1)(C), published in the Missouri Register on November 2, 2020.<sup>1</sup> The proposed amendment amends the rule to (1) extend the manufactured home installers' certification class requirement beyond three years as applicable under extenuating circumstances, and (2) authorize certification classes to be held with virtual attendance.

2. This proposed amendment was initially promulgated as an emergency rule<sup>2</sup> to prevent exposing attendees and Staff to COVID-19 during certification classes. The emergency rule expires April 12, 2021.

3. Staff requests that this emergency rule be adopted as a permanent rule, because after the COVID-19 emergency has subsided, the public health, safety, and welfare may require, in the future, for the installer's certification class requirement to be extended and/or for certification classes to be held via virtual attendance.

**WHEREFORE**, Staff files these comments for the Commission's consideration and information.

<sup>1</sup> *Missouri Register*, Vol. 45, No. 21, P. 1673 (Nov 2, 2020).

<sup>2</sup> *Id.* at 1655.

Respectfully Submitted,

**/s/ Karen E. Bretz**

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case on this 30th day of November, 2020.

**/s/ Karen Bretz**