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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

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Missouri Public
Service Commission

Re: Case No. AX-2000-111

Dear Mr. Roberts:

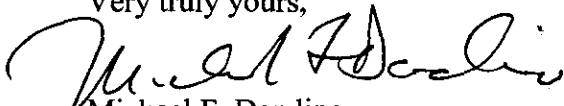
The Office of the Public Counsel makes the following comments on the proposed revision to the Commission rules:

4 CSR 240-2.050 Computation of Effective Dates

1. Public Counsel believes that the former subsection (2) relating to the calculation of time if the allowed time is less than seven days should not be deleted. Deleting this provision would effectively reduce the time to respond by two or three days under the present rule practice. Clearly, four or five days is an unreasonable response time in many situations.
2. OPC also opposes the deletion of the phrase "except after the effective date of a tariff" in (3)(B). Once a tariff is effective it becomes the law and it cannot be modified without restarting the tariff process. The PSC cannot do by rule what the general law does not permit it to do.

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

Very truly yours,


Michael F. Dandino
Senior Public Counsel

MFD:kh

cc: Counsel of record

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