

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

In the Matter of a Working File to)	
Consider Changes to Chapter 13 Service)	Case No. AW-2011-0252
and Billing Practices Rules.)	

**COMMENTS OF THE OFFICE OF THE PUBLIC
COUNSEL ON STAFF’S DRAFT REVISIONS TO
CHAPTER 13 OF THE COMMISSION’S RULES**

COMES NOW the Office of the Public Counsel (OPC) and for its Comments on Staff’s draft revisions to Chapter 13 of the Commission’s rules states as follows:

A. BACKGROUND

The Staff’s draft revisions to the Chapter 13 billing rules have been the subject of extensive discussion during the Staff’s Consumer Services meetings for several years. Representatives from Ameren Missouri, AARP, Atmos Energy Corporation, Empire District Electric Company, Kansas City Power & Light, Laclede Gas Company, Missouri American Water Company, Missouri Gas Energy, and OPC attended the Consumer Services meetings consistently and provided feedback to the Staff as it drafted and redrafted Chapter 13 revisions. The Staff attempted to achieve a compromise on all Chapter 13 revisions, but unfortunately compromise could not be reached in every instance. Where a compromise was not reached among all parties, the Staff determined what would be included in the Staff’s draft revision.

The Staff’s Rulemaking Issue Paper provided to Commissioners for the February 9, 2011 Agenda meeting refers to Staff’s draft revision as “a compromise among the majority of the entities involved.” Since the majority of the entities involved were utility

companies, many proposed revisions are a compromise between utility companies and are not supported by consumer groups. OPC offers the following comments on the changes in the Staff's draft revision. OPC also proposes additional changes to Chapter 13 in areas where the rules do not provide sufficient consumer protections.¹

B. RULE 13.010 – GENERAL PROVISIONS

The first proposed change in the Staff's draft revision is to add *sewer companies* to the type of companies subject to the provisions of the Chapter 13 service and billing rules. OPC agrees that sewer company customers should be protected by applicable service and billing rules of Chapter 13. To the extent that sewer companies argue a need to be exempted from certain billing rules such as metering rules, sewer companies may seek a variance of certain Chapter 13 rules pursuant to 4 CSR 240-13.065.

C. RULE 13.015 – DEFINITIONS

The Staff's draft revisions propose to change the current definitions for the terms: *applicant*, *bill*, *delinquent charge*, *delinquent date*, *in dispute*, *rendition of bill*, *tariff*, and *utility*; and to add new definitions to define the terms: *corrected bill*, *final bill*, *initial bill*, *inquiry*, and *payment agreement*. Properly defining terms used in the Commission's rules is extremely important to ensuring the intent of the Commission's rules is followed. OPC offers the following comments on the proposed definition revisions.

1. *Definition of Applicant*

The Staff's draft revisions propose to amend the definition of *applicant* by adding a sentence that states "Upon initiation of service, the applicant becomes a customer." OPC is concerned that the use of "customer" and "applicant" used throughout Chapter 13

¹ The Staff's draft rule revision filed in this case does not track the draft revisions and incorporates all changes as if they were a part of the rule. "Attachment A" to these comments is a

may not be consistent with the understanding that one does not become a customer until after service is initiated. For example, 4 CSR 240-13.030(1) Deposits and Guarantees of Payment includes rules regarding the conditions for establishing new service, but refers to applicants for new service as “customers.” Chapter 13 should be thoroughly reviewed for these terms to ensure that the words “customers” and “applicants” are used consistent with their definition. The rule should also clarify that a disconnected customer would still be considered a customer rather than an applicant.

2. Definition of Corrected Bill

The Staff’s draft revision proposes adding the definition of *corrected bill*, and to define a corrected bill as “a bill, which is issued due to equipment or mechanical failure, which does not change a customer’s due date for payment.” This new language would appear to authorize utilities to re-bill a customer without adjusting the date payment is due. OPC opposes this definition as written because it would appear to shorten the twenty-one (21) day requirement of 4 CSR 240-13.020(7), which states that “a monthly billed customer shall have at least twenty-one (21) days...from the rendition of the bill to pay the utility charges”.

3. Definition of Inquiry

The Staff’s draft revision proposes to add a definition for the word *inquiry* and to define it as “a question or request for information related to utility service, billing practices and procedures, payment, service or safety responsibilities.” OPC is concerned that this new definition would unintentionally limit the scope of what constitutes an inquiry by excluding subjects that may not fall under “billing practices and procedures, payment, service, or safety responsibilities.” For example, it could be argued that a

tracked version of Staff’s revision that was provided to the parties by the Staff.

question regarding a customer's specific charges may not be an inquiry. OPC proposes expanding the definition to define inquiry as "a question or request for information related to utility charges, services, practices or procedures" or even more broadly, as "a question or request for information."

4. Definition of *Payment Agreement*

The Staff's draft revision proposes to define *payment agreement* as "a payment plan entered into by a customer and a utility which remains in effect as long as its terms are being adhered to for the term of the agreement, which shall not exceed twelve (12) months duration, unless the customer and utility agree to a longer period." OPC opposes adding this definition because the proposed language does not adequately define *payment agreements*. Instead, the proposed language establishes two requirements for payment agreements: 1) effective until expired or violated; and 2) limited to twelve months unless otherwise agreed to. Simply defining a payment agreement as a "payment plan," and then providing requirements for these plans, is not a proper definition.

In addition, a better place for payment agreement requirements would be in 4 CSR 240-13.060 Settlement Agreement and Extension Agreement. Staff's draft revision proposes to replace the term "settlement agreement" with "payment agreement" in 4 CSR 240-13.060, and it makes sense to provide general agreement term and duration requirements in 4 CSR 240-13.060 rather than 4 CSR 240-13.015.

5. Definition of *Rendition of a Bill*

The current definition of the term *rendition of a bill* and the proposed definition of the same term are as follows:

Current Rule:	<i>Rendition of a bill means the mailing or hand delivery of a bill by a utility to a customer.</i>
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Staff Draft Revision: *Rendition of a bill occurs on the date mailed, posted electronically, delivered or otherwise sent to the customer.*

OPC is concerned with the open ended nature of the phrase “or otherwise sent to the customer” and would eliminate that phrase from the definition. Leaving the definition open-ended creates the potential for abuse. All forms of billing a customer would be covered by the terms “mailing, electronic posting, or hand delivery”, and therefore, OPC recommends maintaining the term “hand delivery” in the definition to allow hand delivery of bills.

If the definition of *rendition of a bill* is changed to include “posted electronically,” OPC proposes defining “posted electronically” in 4 CSR 240-13.015. The term alone does not explain whether it includes more than an e-mail message to the customer’s e-mail account. Without definition, the term could allow a utility to render a bill simply by “posting” a general message on its website that bills are ready for payment without making any direct contact with the customer.

D. RULE 13.020 – BILLING AND PAYMENT STANDARDS

The Commission’s Billing and Payment Standards Rule (4 CSR 240-13.020) establishes basic customer rights, such as the customer’s right to be billed monthly, and the customer’s right to have their bill based upon actual usage whenever possible. Certain changes proposed in the Staff’s draft revision would erode these basic rights and should be rejected.

1. OPC Opposes Expanding the Use of Estimated Bills

One important fundamental consumer protection in the current billing rules is the requirement that bills for service be based on actual usage whenever possible. The

Staff's draft revision would change this fundamental protection by expanding the use of estimated billing. The current Commission rule 4 CSR 240-13.020(2) prohibits the use of estimated bills except in three circumstances: 1) to seasonally billed customers; 2) when extreme weather, emergencies, labor agreements, or work stoppages prevent actual meter readings; or 3) when the utility is unable to gain access to the customer's premises for the purpose of reading the meter. These rules indicate a Commission policy of prohibiting estimated billing unless absolutely necessary, which the Commission determined occurs when the meter cannot be read, or where a seasonal customer agrees to an estimated bill. The Staff's draft revision proposes to change this policy by allowing bills to be estimated in situations where an actual physical meter reading is possible, but the utility would prefer to estimate the bill rather than obtain an actual reading.

OPC urges the Commission to reject this proposal and maintain the current protections that require actual meter reads when an actual meter reading is possible. OPC is not aware of any good reason to adopt the proposed change. Requiring actual reads where an AMR fails will reduce the instances where a customer receives a large catch-up bill because the bill was based on an estimate rather than an actual read.

Billing adjustments resulting from failed AMRs have been a very contentious issue between Missouri's natural gas companies and Missouri's residential natural gas customers. Revising the rule as proposed in the Staff's draft revision would lessen consumer protections, would increase the number of estimated bills, and would likely increase the number of complaints. OPC asks the Commission to reject this proposal and prevent this erosion of consumer protections. Consumers deserve the most accurate meter read possible. If the utility's AMR malfunctions, the utility should be required to

either send someone to the premise to obtain a reading, or allow the customer to self-read the meter and report usage to the utility.

2. OPC Opposes Restricting the Use of Customer Supplied Meter Readings

The current rules protect consumers from estimated billing by requiring the utility to “use customer-supplied readings whenever possible.” The Staff’s draft revision would lessen this by only requiring companies to use customer-supplied readings whenever “practical.” If approved, this change could effectively eliminate a customer’s ability to self-read and would increase the use of estimated billing. A utility may always consider customer-supplied readings to be “impractical” for the utility when compared to the ease of simply sending an estimated bill. A customer is entitled, whenever possible, to a bill based on actual usage, and a customer should be allowed to provide an actual meter reading to avoid estimated billing. OPC opposes this change and urges the Commission to keep the current consumer protection of requiring the company to base usage on the customer’s self-reporting, instead of estimating the bill, whenever *possible*.

3. OPC Proposal Regarding the Term “Filed Tariff”

Staff’s draft revision proposes adding the word “filed” before the word “tariff” in 4 CSR 240-13.020(1), which currently states “A utility shall normally render a bill for each billing period to every residential customer in accordance with its tariff.” OPC suggests that the term “filed tariff” might not imply an approved tariff, and therefore, OPC proposes using the term “Commission approved tariff” rather than “filed tariff.”

4. OPC Proposal Regarding Customer Bill Status Information

The Staff’s draft revision proposes to add a new subsection 4 CSR 240-13.020(14) that states “A utility may provide customers current bill status information via

telephone, electronic transmission or mail.” OPC proposes modifying this by requiring the utility to make bill status information available in the format requested by the customer.

E. RULE 13.025 – BILLING ADJUSTMENTS

The Staff’s draft revision does not make many changes to the Commission’s Billing Adjustment Rule, 4 CSR 240-13.025. OPC proposes changes to the Billing Adjustment Rule to address areas where the current rules have not adequately protected customers, especially customers that have been forced to pay large billing adjustments for reasons caused by the utility’s equipment. The utilities, not customers, made the decision to switch from using in-person meter readers to using AMRs, and therefore, the utilities should be responsible for a greater share of the harm caused when AMR equipment fails or is inadequate to produce an actual read. The goals of the following OPC proposals are to protect consumers by: 1) preventing large billing adjustments when the company’s equipment fails; 2) giving consumers more time to pay a billing adjustment; and 3) requiring utility companies to comply with estimated billing rules and document such compliance before adjusting usage that was estimated.

1. OPC Proposal to Shorten the Undercharge Adjustment Period to Six (6) Months When Company Meter or AMR Fails

OPC proposes an amendment to 4 CSR-240-13.025(1) to shorten the period of time a utility is allowed to re-bill customers for prior usage after a meter or AMR fails. Currently, utilities are allowed to re-bill customers for up to twelve (12) months, even in instances where the reason for the incorrect billing was due to a malfunction of company-owned equipment. Shortening this period to six (6) months for failed meters and automatic meter reading equipment will lessens the size of the adjustment for the

consumer. Adding up to an entire year of usage onto customer's bills can be an extremely difficult challenge for customers with limited income. These adjustments have been the subject of many complaints filed with the Commission. Lowering the adjustment to a maximum of six months should also give utility companies an added incentive to resolve faulty meter issues immediately. It also rightly recognizes that the utility company, not the customer, is responsible for keeping its meter functioning and accurate.

2. OPC Proposal to Expand the Repayment Period

The Staff's draft rule proposes to add a subsection that states "*In the event of an undercharge, the utility shall offer the customer the option to pay the adjusted bill over a period equal to the period covered by the adjusted bill.*" For customers on a fixed and limited income, requiring a customer to pay an entire year of undercharges at the same time that the customer is paying for current service could be very difficult for many ratepayers to afford. OPC recommends giving ratepayers a period of time that is twice the length of time covered by the billing adjustment. This would help reduce the burden on unfortunate ratepayers who receive a large undercharge adjustment due to the failure or inadequacy of the company's metering equipment. For example, under OPC's proposal, if a customer received a 6 month billing adjustment after an AMR failed, the customer would have 12 months to pay the adjustment.

3. OPC Proposal to Require Estimated Billing Rule Compliance by the Utility Before the Utility Can Make an Undercharge Adjustment to Correct Estimated Usage

OPC proposes amending 4 CSR 240-13.025 to require utility companies to comply with subsections 4 CSR 240-13.020(1), (2), (3) and (4), and to adequately

document and retain records of such compliance, before an undercharge adjustment can be made on a customer's bill to correct estimated usage. The new language could state as follows:

(E) No undercharge adjustment shall be made for usage that was previously estimated and where the utility has not complied with 4 CSR 240-13.020 subsections (1), (2), (3), and (4), and adequately documented and retained records of such compliance.

OPC believes this change is necessary to protect consumers when the utility has not followed the rule requirements that protect ratepayers from estimated billing. If these rules are not followed by the utility, there is no assurance that the customer was not unreasonably subject to estimated billing, and therefore, the utility should be prohibited from adjusting the customer's bill upward to correct the previously estimated bill.

F. RULE 13.030 – DEPOSITS AND GUARANTEES OF PAYMENT

1. OPC Opposes the Proposal to Eliminate the *Prima Facie* Showing of an Acceptable Credit Rating

The current rules allow a utility company to assess a deposit on new accounts where the customer is unable to establish an acceptable credit rating. The rules also provide that new customers "shall be deemed *prima facie* to have established an acceptable credit rating" and avoid the burden of paying a deposit before initiating service if the new customer meets any one of the following criteria: 1) owns or is purchasing a home; 2) has been regularly employed full-time; 3) has a regular source of income; or 4) can provide adequate credit references. 4 CSR 240-13.030(1)(C). The Staff's draft revision would eliminate this consumer protection for every utility that uses credit scoring. OPC opposes this revision because the current rule provides a much-needed protection for customers that are a low credit risk but for a multitude of reasons

may be unable to establish an acceptable credit rating. An applicant's ability to purchase a home, maintain a full-time job, receive a regular source of income, or obtain credit references should be maintained as a *prima facie* showing that the applicant has an acceptable credit rating. Credit ratings remain tied to individuals even after the reasons for a poor credit rating may have changed. Maintaining the *prima facie* showing will preserve the existing consumer protections that take changed circumstances into account.

The decision of whether to provide an essential service such as utility service to an applicant should err on the side of making the service available. In the event service is extended and the customer fails to make timely payments of their bill, the company has many protections available to assist the utility, such as additional late fees and reconnection fees, or the ability to disconnect service.

2. OPC Proposal to Minimize Deposit Amounts

The current Deposits and Guarantees of Payment Rule require that a deposit "shall not exceed two (2) times the highest bill." 4 CSR 240-13.030(4)(A). The Staff's draft revision proposes to give the utility company the option of charging a deposit equal to two (2) times the highest bill as currently allowed, "or four times the average bill, whichever is stated in the utilities tariff." OPC proposes that the rule establish a practice to be followed consistently by all utility companies that would assess a deposit of *the lesser of* two times the highest bill or four times the average bill. This would reduce an obstacle to obtaining service by while still providing the utility a deposit that would likely cover several months of service.

3. OPC Opposes the Proposal to Limit the Time Period for Returning Deposits, and OPC Proposes a Change that Obligates the Utility to Make all Reasonable Efforts to Return a Deposit

The Staff's draft revision at 4 CSR 240-13.030(4)(G) would require a utility to maintain a deposit due to be refunded to a customer for five (5) years. OPC opposes this restriction. Customers give deposits with the understanding that their deposit will be returned to them. OPC is not aware of any good policy reason to support this change since it would deprive consumers of money owed to them by their former utility.

In addition, OPC proposes a change to 4 CSR 240-13.030(4)(G) that would require the utility company to make all reasonable efforts to return deposits to customer once the customer is entitled to a refund of the deposit.

4. OPC Opposes the Proposal to Deny a Customer's Ability to Pay a Deposit in Installments Where the Customer Does Not Have an Acceptable Credit Rating

The current Deposits and Guarantees of Payment Rule requires utility companies to allow customers owing a deposit to pay that deposit in installments unless the utility can show a likelihood that the customer does not intend to pay for the service. 4 CSR 240-13.030(4)(I). The Staff's draft revision proposes to add new reasons why a utility can deny an applicant the ability to pay a deposit in installments. Among these new reasons for denying installment payments is where "the applicant is unable to establish an acceptable credit rating." OPC opposes this reason for denying installment payments. Unless and until the Commission establishes rules for acceptable credit scoring, customers should not be subjected to credit scoring as a determining factor in assessing deposits. Paying a large deposit could create a barrier to receiving service for a customer, and allowing the payment of that deposit in installments is a way around that barrier and enhances the ubiquitous availability of service. OPC does not oppose denying

installments where the customer has in an unauthorized manner interfered with or diverted service, as proposed by the Staff's draft revision.

5. OPC Proposes to Make Credit Rating Standards Consistent Among Utilities

One purpose of the Denial of Service Rule, 4 CSR 240-13.035, is to establish "procedures to be followed by utilities to insure reasonable and uniform standards exist for denial of service." The current rules, and the Staff's draft revision, require utilities to follow the acceptable credit rating standards contained in each utility's tariffs. As a result, there is no "reasonable and uniform standard" for what constitutes or should constitute an acceptable credit rating. OPC believes consumers would benefit if the Commission were to establish credit rating standards that apply equally to all utilities and all ratepayers, rather than a rule that allows credit rating standards to vary between utilities.

G. RULE 13.045 – DISPUTES

The Staff's draft revision proposes to change 4 CSR 240-13.045(6), in part, by inserting the words "the lesser of" into the rule. It is not entirely clear what Staff is intending to accomplish with this change because the language "the lesser of" appears to be misplaced. OPC asks the Staff to provide additional clarification for this change.

H. RULE 13.050 – DISCONTINUANCE OF SERVICE

1. OPC Opposes the Staff's Draft Revision Proposal to Delete a Limitation on Discontinuing Service

The Staff's draft revision proposes to delete subsection 4 CSR 240-13.050(2)(F), which establishes an instance where sufficient cause does not exist to discontinue service.

Subsection 4 CSR 240-13.050(2)(F) current states that service may not be discontinued for:

The failure to pay a bill correcting a previous underbilling, whenever the customer claims an inability to pay the corrected amount, unless a utility has offered the customer a payment arrangement equal to the period of underbilling.

OPC opposes this deletion because it provides an important consumer protection. Rather than delete this subsection, OPC proposes keeping the subsection in place and amending it to require the utility to offer a customer a payment arrangement equal to *twice* the period of underbilling. This will help prevent customers from being burdened with a bill that is double their normal bill in instances where the customer needs additional time to pay for the previous underbilling.

2. OPC Opposes the Staff's Draft Revision Proposal to Extend the Hours Service May be Discontinued

The Staff's draft revision proposes to extend the hours a utility may discontinue service, as provided for in 4 CSR 240-13.050(3). Currently, a utility may discontinue service between the hours of 8:00 a.m. and 4:00 p.m. The Staff's draft revision would extend the hours service may be discontinued to between the hours of 7:00 a.m. and 7:00 p.m. OPC opposes this proposed change because ratepayers should not have service disconnected in the evening hours when their ability to find other shelter would be limited as a result of a late day disconnection.

OPC agrees with the Staff's draft revision proposed requirement that the utility be "accessible to receive a restoration of service request at least one (1) hour after the disconnect time frame." However, this addition is unnecessary if the current discontinuance limitation stays at 4:00 p.m. since a 4:00 p.m. disconnection would still

give ratepayers an opportunity to contact the utility during normal business hours to request a restoration of service.

3. OPC Questions the Staff's Draft Revision Proposal to Hold Landlords Liable for the Expense of Forcing Access to a Meter

The Staff's draft revision would make landlords liable for expenses incurred by the utility when it forces access to the landlord's property for purposes of accessing the utility's meter. This change is meant to address problems faced by utilities attempting to gain access to meters on rental property where the non-customer landlord is unwilling to assist the utility in gaining access. OPC understands the purpose of this proposed change, and agrees that additional steps may be necessary to exert pressure on landlords to allow access to their property. However, OPC questions whether the Commission has the legal authority to hold landlords responsible for expenses where the landlord is not the utility's customer.

4. OPC Opposes the Staff's Draft Revision That Would Remove the Requirement that Utility Companies Attempt to Contact Customers at the Time of Disconnection

The current rules include a requirement that promotes the health and public safety by requiring an attempt at human contact prior to disconnection. This is an important safety precaution in that a knock on the door could help consumers by allowing them to quickly arrange to have service restored, and to quickly arrange to find shelter elsewhere should that become necessary. Otherwise, consumers may not be aware of the shut-off until the furnace stops working.

When discussing the purpose of this proposed change during the Staff's Consumer Services meeting, one reason stated for this proposed change was the safety of

company personnel. However, OPC is not aware of any instance where utility company personnel were attacked by their customer as a result of contacting the customer at the time of disconnection pursuant to 4 CSR 13.050(8). In addition, the current rule already protects company service personnel in that the company does not need to attempt to contact the customer at the time of disconnection “where the safety of the employee is endangered.” The proposed change is unnecessary, against the public interest, and should be rejected.

I. RULE 13.055 – COLD WEATHER RULE

1. OPC Opposes the Staff’s Draft Revision That Would Remove the Requirement that Utility Companies Attempt to Contact Customers at the Time of Disconnection

The Staff’s draft revision in 13.050, addressed above, eliminating the requirement to attempt to contact customers at the time of disconnection, was also proposed in the Staff’s draft revision for the Cold Weather Rule (CWR) by proposing to delete 4 CSR 13.055(3)(C), which says that disconnections during the CWR period also requires an attempt to contact the customer prior to disconnection unless the employee is endangered. OPC opposes this deletion for the same reasons OPC opposes the proposal to delete 4 CSR 13.050(8).

2. OPC Proposal to Better Educate Elderly and Disabled Customers of the Need to Register to Benefit from Certain Protections of the Cold Weather Rule

OPC proposes a revision to the CWR to decrease the chances that an elderly or disabled customer is disconnected during the CWR period of November 1 through March 31. The CWR currently requires utility companies to make a personal contact with elderly and disabled customers before disconnecting service during the CWR period. 4

CSR 240-13.055(3)(D). To be registered with the utility as an elderly or disabled customer, the customer must file with the utility a form approved by the utility attesting to the fact that the customer is elderly or disabled. 4 CSR 240-13.055(1)(D). OPC is concerned that qualifying elderly and disabled customers may not be aware of the need to file a form with their utility company to receive these additional protections. The rules do not include any notice requirements on the part of the utility. OPC proposes adding a requirement that the utility periodically notify all customers that elderly and disabled customers can receive additional protections during cold weather by filing a form with the utility. Additionally, OPC proposes to allow consumers with serious medical conditions to also register with the utility and be contacted in the same manner as elderly and disabled customers.

J. RULE 13.060 – SETTLEMENT/EXTENSION AGREEMENTS

The Staff’s draft revision proposes to delete 4 CSR 240-13.060(4) which states that “the utility may enter into an extension agreement upon a request of a customer who claims an inability to pay the bill in full.” Extension agreements protect consumers by giving the utility the option to give additional time to pay a bill. OPC opposes a rule change that would remove the utility’s ability to offer an extension agreement.

K. CONCLUSION

OPC appreciates this opportunity to provide early feedback on the Staff’s draft revision to Chapter 13. OPC urges the Commission not to eliminate any existing consumer protection, and to adopt OPC’s proposals to amend the rules where existing rules are inadequate to protect consumers from harm.

WHEREFORE, the Office of the Public Counsel respectfully offers these comments on the Staff's draft revisions to Chapter 13 of the Commission's rules.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 1st day of March 2011.

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