

Surveillance Monitoring Proposal

What is it?

A program of surveillance/monitoring activities designed to produce timely information to support the Commission's responsibilities. Examples of the intended information that would be produced by this program would be periodic reports addressing the overall rate adequacy, causes/reasons for rate deficiencies or excess, quality of service trends and customer class trends on a current basis for jurisdictional utilities. The proposal is to consolidate the Agency's current surveillance activities into surveillance/monitoring program designed to produce information regarding a utility's financial and operational condition now and expected in the future. Current quality of service reporting would support a portion of the quality of service surveillance/monitoring. The program is intended to produce contemporary information to support the Commission's case and enforcement responsibilities.

What would be done differently?

A large portion of the case specific work would be performed on a routine basis and applied to cases as they are filed with Commission.

The agency would be more timely informed regarding financial and service quality issues prior to a case being filed to address the matter.

Case can be supported by existing information instead of producing case specific information at a later date.

Existing information can be referenced to support case minimum filing requirements.

A new forum will be established for issue discussion before a case is filed allowing more latitude in addressing an issue as well as creating a better understanding of the matter at the time the case is filed.

Prior experience has shown how prospective discussion of financing proposals before the filing of a related financing case has shortened processing times in a majority of these cases. This activity was initiated from discussions in a prior Commission workshop.

More Agency personnel would be involved in surveillance/monitoring of jurisdictional utilities while case specific activities would decline.

Would the electric utilities responsibilities be any different than they are today?

The utilities would be subject to the same discovery practices as exist today.

The standard rate case data request material would largely be in existence before the rate case is filed.

It is expected that surveillance/monitoring information would incorporate utility comments regarding their opinion of the material similar to prior management audits.

Would other parties have access to the information?

The specific utilities would have access to Staff's reports on that utility. Staff will seek comments from the utility addressed in the report.

The Office of Public Counsel would have access to the information.

The other interested parties, including other utilities, would have access to the information contingent with acceptable safeguards being established to address improper disclosure.

What would be the impact on Missouri cases?

The program should be beneficial to most cases as it provides background material on the utilities operating in Missouri.

Reduce processing work and assist in issue identification in rate increase cases.

It will significantly impact the processing of complaint cases concerning excessive rates concerns.

What would be needed to transition to a formal Surveillance/Monitoring program?

The objective(s) of the program, its outputs, and inputs need to be well defined.

The objectives would need to be disclosed to interested parties so program can be regularly measured as a success, failure, or in need of modification.

Party buy-in will impact the quality and timing of information.

Probably utilize a rule-making process to allow full venting of the initiative.