

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

In the Matter of Staff's Review)
Of the Commission's)
Chapter 31 Rules) **Case No. TW-2017-0078**

And

In the Matter of Staff's Review)
Of the Commission's)
Chapter 28 Rules) **Case No. TW-2018-0098**

STAFF RESPONSE TO JOINT MOTION FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Response to Joint Motion for Extension of Time* states as follows:

1. Staff filed October 17, 2017, in each of the above-referenced dockets a request for initial stakeholder comments in response to its proposals for changes to its Chapter 31, Chapter 28 and Chapter 37 rules, respectively. Staff performed an in-depth review of each of the chapters related to the governor's Executive Order 17-03, which produced all of the suggestions for chapters 28 and 37, along with suggestions related to the Executive Order and others resulting from a rulemaking workshop for Chapter 31.
2. Staff asked all interested parties to review its proposed changes and submit any initial comments and suggestions no later than October 23, 2017. This deadline was deliberately set to meet certain deadlines relating to the Governor's executive order.
3. Certain interested stakeholders filed a *Joint Motion for Extension of Time* October 18, 2017, asking for a 30 day extension to Staff's requested deadline, which

would result in initial comments submitted as late as November 23, 2017. Staff will be unable to meet the governor's deadlines should the Commission grant this request for a 30 day extension.

4. Staff is sympathetic to the interested parties' *Motion*, however, it sees no other way to extend the informal rulemaking process and still meet the deadlines set upon this process. Staff specifically requested initial comments by October 23, 2017, but anticipates receiving additional feedback in the next few weeks and intends to work with interested stakeholders following the filing of the proposals with the Secretary of State and throughout the formal rulemaking process. Therefore, Staff asks that the Commission deny the interested parties' *Joint Motion* and uphold the original date Staff requested for *initial* comments.

WHEREFORE, Staff asks the Commission to deny the *Joint Motion for Extension of Time*; permit parties to continue discussion of the proposals throughout the next few weeks before the rules are published and during the formal rulemaking process; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 18th day of October, 2017, to all counsel of record.

/s/ Whitney Payne