



4. Regarding the 30-day requirement under Commission Rule 20 CSR 4240-10.0175(15) and Section 393.140(11), RSMo, the revised timeline filed on July 30, 2020 in conjunction with the *Notice of Extension* had a target due date of August 9, 2020 for Raytown to file the necessary tariff revisions, which was a Sunday. The calendar due date identified in the case timeline was August 10, 2020, the following Monday.

5. The exemplar tariffs attached with the *Unanimous Disposition and Agreement* filed on August 4, 2020, as well as those later shared with Raytown leading up to its August 10, 2020 filing, utilized the August 9, 2020 target date and its accompanying September 8, 2020 effective date.

6. While conducting its review, Staff inadvertently utilized the August 9, 2020, target date, per the case timeline, rather than the actual filing date of August 10, 2020, when determining whether Raytown's tariff sheets bore a 30-day effective date.

7. As noted by the Commission, Raytown's compliance tariff sheets bore a 29 day effective date. Due to the difference being one day, Raytown having remedied Staff's concerns by pulling the tariffs that Staff recommended be rejected, and the Office of the Public Counsel also supporting approval of the remaining tariff sheets, Staff posits that good cause exists and would have no objection to a waiver of the rule under Commission Rule 20 CSR 4240-10.075(15) or Section 393.140(11), which would allow the remaining tariffs to go into effect within 29 days on September 8, 2020.

**WHEREFORE**, Staff prays that the Commission accepts its *Staff Response to Commission Order*, and grant any such other and further relief as is just under the circumstances.

Respectfully Submitted,

**/s/ Travis J. Pringle**

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand delivered, transmitted by facsimile or electronically mailed to all parties and/or their counsel of record this 24th day of August, 2020.

**/s/ Travis J. Pringle**