

six feet (6') of space between individuals.”¹ Phase 1 is to be reevaluated on May 31, 2020, to determine if the State of Missouri is prepared to move on to Phase 2.

3. Further, Raytown serves customers within the Jackson County area, which has implemented its own COVID-19 recovery plan. In addition to the social distancing requirements outlined in the “Show Me Strong” recovery plan, Jackson County is continuing to implement a ban on gatherings over ten (10) people.² The ban will be reevaluated every 14 days depending on testing and COVID-19 caseload metrics.

4. Due to the current guidance in effect in both the State of Missouri and Jackson County, as well as the continuing uncertainty and fluid nature of the ongoing COVID-19 crisis, the Parties have agreed that it is not possible to hold an in-person local public hearing on or after June 1, 2020.

5. Following discussions amongst the Parties, two options have been identified as alternatives to an in-person local public hearing:

- a. An online, virtual public hearing, and/or
- b. Continue to encourage the filing of electronic comments on EFIS, and Staff will compile those comments into a document to be filed in the case file.

A. VIRTUAL PUBLIC HEARING

6. Per Raytown’s 2018 annual report, it serves 6,628 total customers. A local public hearing under the current Jackson County recovery plan would require the Parties to refuse access to customers once the ten (10) person threshold was met.

¹ “Show Me Strong” Economic Reopening Plan, Phase 1, <https://governor.mo.gov/sites/gov/files/media/pdf/2020/04/Economic-Reopening-Phase-1.pdf>.

² Jackson County Recovery Plan Phase 1, <https://www.jacksongov.org/DocumentCenter/View/6758/Recovery-Plan-Phase-1-PDF>.

7. To best accommodate the maximum number of customers possible, the Parties propose that the Commission order the local public hearing be held in a virtual forum. As the COVID-19 crisis has progressed, many Missourians across the state have become accustomed to participating in doctor's appointment, work meetings, local government gatherings, and even the teaching of their children in various virtual settings. If a local public hearing by virtual forum is ordered, the Parties recommend that the Commission host the hearing utilizing a virtual meeting platform, such as Zoom.³

8. In order to help customers attend the virtual public hearing, the Parties propose that the notice of a virtual public hearing include an email address for customers to contact to indicate if they would like to provide testimony to the Commission, as well as receive an invite to the virtual public hearing. If any of the Parties would like to include a handout describing their role and position in this matter that may be included with the notification as well. The hand-outs may also be electronically attached to the virtual public hearing invites.

9. The Parties also propose that, in lieu of a traditional live Q&A session, customers submit questions directly to representatives of Raytown, Staff, and OPC, prior to the virtual local public hearing. The contact information for these representatives would be included in the notice for local public hearing sent to customers. The Parties propose the following dates and times for the virtual local public hearing: any date after June 10, with the exception of June 25 due to previously scheduled Commission business.

³ Certain subscriptions for Zoom have the ability to host upwards of 1,000 participants at a time, thus maximizing the number of customers who could participate in the virtual local public hearing. However, increasing the number of participants to 1,000 will require the Commission purchasing an upgraded Zoom package, but it is the recommendation of the Parties that the Commission do so to maximize participation. The cost of such an upgrade, under the Commission's current Zoom plan, would be \$109.99/month.

10. The Parties further realize that it would be impossible to potentially accommodate all 6,628 Raytown customers in one virtual local public hearing. The Parties also propose an alternative method of holding multiple virtual local public hearings on each of the dates proposed to accommodate as many Raytown customers as possible.

B. CONTINUE TO ENCOURAGE THE SUBMISSION OF PUBLIC COMMENTS, AND ORDER STAFF TO FILE THE COMMENTS AS A DOCUMENT TO BE FILED IN THE CASE FILE

11. The Parties have continued to encourage customers to submit public comments. As of the date of this filing, 31 comments have been received by Staff through EFIS.

12. If the Commission were to reject the Parties proposal for a virtual local public hearing, the Parties propose that the Commission order Staff to compile the submitted comments into a single document for filing in the case file by June 30.

13. If the Commission so orders, a virtual public hearing could be held in conjunction with the compiling of public comments to file as a document in the case file.

WHEREFORE, Staff prays, on behalf of itself, Raytown, and OPC, that the Commission accept the parties' proposal, 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 15th day of May, 2020.

/s/ Travis J. Pringle