BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of a Working Case to Consider Proposals to Create a Revenue Decoupling Mechanism for Utilities

File No. AW-2015-0282

MOTION TO DIRECT INTERESTED STAKEHOLDERS TO RESPOND TO QUESTIONS PRESENTED BY COMMISSION STAFF AND NOTICE OF WORKSHOP

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COMES NOW the Staff of the Missouri Public Service Commission (Staff), and respectfully requests the Commission issue an Order directing interested stakeholders to respond to the questions presented below, in their September 1 comments, which will be used for discussion at the workshop, and to provide notice of the date, time, and location for the workshop on this matter. In support of its Motion Staff states:

1. On July 22, 2015, the Missouri Public Service Commission (Commission) entered its Order Opening a Working Case to Consider Proposals to Implement a Revenue Decoupling Mechanism for Missouri's Utilities.

2. In order to facilitate the discussion amongst the various stakeholders, the Commission Staff proposes that responses to the following questions be included in the comments of interested stakeholders, which will be utilized as a guide during the workshop:

- a. Please comment on the legality of decoupling in Missouri.
- b. Please comment on your interests and preferences for any of the various aspects related to revenue regulation and decoupling contained in "Revenue Regulation and Decoupling: A Guide to Theory and Application, June 2011, The Regulatory Assistance Project".

- c. What is your estimate of the resulting rates based on your preference(s)identified in response to question (b) customer charge, usage charge?
- d. Please provide sources or papers on alternative rate mechanisms, revenue decoupling or similar topics which will further the Commission's knowledge on the subject of the docket.
- 3. Staff requests that the Commission provide notice that on September 17,

2015 from 10:00 am to 3:00 pm in Room 450 of the Governor's Office Building a workshop will be held for all interested stakeholders.

WHEREFORE, Staff requests that the Commission issue an Order directing stakeholders to address the questions contained herein in their September 1 comments and to set the date, time, and location of the workshop to be held on September 17, 2015 from 10:00 am to 3:00 pm in Room 450 of the Governor Office Building.

Respectfully submitted,

/s/ Cydney D. Mayfield

Cydney D. Mayfield Missouri Bar Number 57569 Senior Counsel

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by First Class United States Mail, postage prepaid, to all counsel of record this **30th day of July, 2015.**

/s/ Cydney D. Mayfield