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November 1, 1999

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED
NOV - 1 1999
Missouri Public
Service Commission

Re: Case No. AX-2000-114

Dear Mr. Roberts:

The Office of the Public Counsel makes the following comments on the proposed revision to the Commission rules:

4 CSR 240-2.070 Complaints

1. (1) Public Counsel supports the revision of the rule that adds "The Commission on its own motion" to the persons authorized to file a complaint.
2. (6) OPC also supports the addition of "after notice" as a condition prior to dismissing a complaint since it gives the complainant an opportunity to present reasons why it should not be dismissed.
3. (9) OPC supports this new provision which provides a procedure for default and for setting aside the default. This allows a complaint process to proceed to a remedy in a timely fashion even if the utility ignores the complaint and does not respond.
4. (5) OPC proposes the following addition to 2.070(5): "The Commission secretary shall make available complaint forms and distribute the forms upon request to assist and simplify the filing of complaints."

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We have enclosed the original and fourteen copies for filing with the Commission.

Very truly yours,

A handwritten signature in cursive script, appearing to read "M. F. Dandino".

Michael F. Dandino
Senior Public Counsel

MFD:kh

cc: Counsel of record