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Secretary of the Commission
Missouri Public Service Commission
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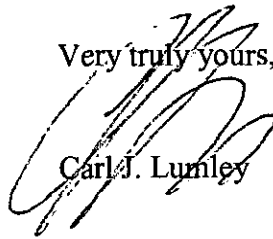
Re: Case No. AX-2002-158

Please accept this letter as our Firm's comments on the proposed changes to Rule 2.115 on Stipulations and Agreements.

Regarding subsection (2)(B), we submit that the seven-day time period is too short for a situation in which a default waiver of hearing rights can result. At least ten days should be allowed, given the potential consequences.

Thank you for considering our comments.

Very truly yours,



Carl J. Lumley

cc. Office of Public Counsel
General Counsel