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Secretary of the Commission
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. TX-2003-0379

Dear Secretary of the Commission:

Thank you for the opportunity to submit comments regarding proposed rule 4 CSR 240-3.545.

We see the potential for significant practical problems under subsection (12), in that a tariff filing could contain any number of rates and it would be impractical to list all the rates in a cover letter (and not possible with a 100-word limit). If the Commission is intent on highlighting all rate changes, then perhaps a separate price change document should be allowed as part of a filing.

Additionally, we note that the cross-reference in subsection (15) appears to be in error, as there is a proposal to renumber that section to 33.040(4).

Very truly yours,

/s/ Carl J. Lumley

Carl J. Lumley

CJL:dn

cc. Office of Public Counsel
General Counsel