

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION
JEFFERSON CITY
November 22, 1999

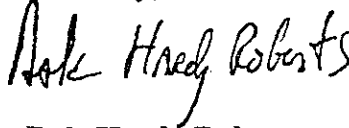
CASE NO: EX-99-442, HX-99-443, GX-99-444, GX-99-445

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Enclosed find certified copy of a DISSENTING OPINION in the above-numbered case(s).

Sincerely,

A handwritten signature in black ink that reads "Dale Hardy Roberts". The signature is written in a cursive, slightly slanted style.

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of 4 CSR 240-20.015)	
Proposed Rule - Electric Utilities)	<u>Case No. EX-99-442</u>
Affiliate Transactions)	

DISSENTING OPINION OF COMMISSIONER CONNIE MURRAY

I respectfully dissent from the decision of the majority to issue the Order of Rulemaking. Although the final rule is more closely tailored to accomplish its stated purpose than was the originally proposed rule, it remains more restrictive than necessary and may result in increased costs to utilities and reduced benefits to consumers.

The requirements of asymmetrical pricing and the use of fully distributed cost methodology exceed what is needed to prevent cross-subsidization. These requirements provide an advantage to competitors and a disadvantage to regulated utilities and their affiliates. When the competitive scale is tilted in either direction, the consumer loses.

Therefore, I must vote against this final order of rulemaking.

Respectfully submitted,



Connie Murray, Commissioner

Dated at Jefferson City, Missouri,
on this 16th day of November, 1999.

**STATE OF MISSOURI
OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and
I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson
City, Missouri, this 22nd day of November 1999.**

Dale Hardy Roberts

**Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge**

