

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

In the Matter of Proposed Revisions to)
Improve the Commission's Rules) **Case No. AX-2018-0395**

STAFF'S COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission and submits,
for the Commission's consideration, the attached comments.

Respectfully submitted.

/s/ Travis J. Pringle
Travis J. Pringle
Legal Counsel
Missouri Bar No. 71128
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-4140 (Voice)
573-751-9285 (Fax)
travis.pringle@psc.mo.gov

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served, either electronically or by First Class United States Mail, postage prepaid, upon all parties or their representatives according to the Service List maintained by the Commission's Data Center, on this 18th day of January, 2019.

/s/ Travis J. Pringle

Case No. AX-2018-0395

Comments of the Staff of the Missouri Public Service Commission

As part of its review of Commission rules in compliance with Executive Order 17-03, Staff recommended rescission of certain duplicative requirements in Chapter 3, and amendments to consolidate requirements in Chapters 10 and 13. Additionally, Staff used the rule review process as an opportunity to propose language updates and clarifications in the forms of amendments to Chapters 2, 10, and 13, and promulgation of a new rule in Chapter 2. These changes are designed to streamline, simplify, and improve the user-friendliness of Commission rules.

Staff supports the proposed rescissions:

- 4 CSR 240-3.015 Filing Requirements for Utility company Applications for Waivers or Variances
 - Duplicative – simply refers to Chapter 2 for requirements
- 4 CSR 240-3.020 Filing Requirements Regarding Utility Company Name Changes
 - Duplicative – simply refers to Chapters 2 and 3 for requirements
- 4 CSR 240-3.025 Utility Company Tariff Filings Which Create Cases
 - Duplicative – simply refers to Chapter 2 for tariff rules and filing requirements
- 4 CSR 240-3.180 Submission of Electric Utility Residential Heat-Related Service Cold Weather Report
 - Duplicative – consolidating into proposed amendment 4 CSR 240-13.055
- 4 CSR 240-3.250 Submission of Gas Utility Residential Heat-Related Service Cold Weather Report
 - Duplicative – consolidating into proposed amendment 4 CSR 240-13.055

Staff supports the proposed amendments:

- 4 CSR 240-2.010 Definitions
 - Update – removes nonexistent positions and properly defines Staff counsel
- 4 CSR 240-2.070 Complaints
 - Clarification – of proper service and Staff's role in small complaints
- 4 CSR 240-2.120 Presiding Officers
 - Clarification – adds “discovery conferences” to reflect current practice
- 4 CSR 240-3.010 General Definitions
 - Update – corrects an improper statutory reference
- 4 CSR 240-3.030 Minimum Filing Requirements for Utility Company General Rate Increase Requests
 - Update – proposes language to be consistent with the newly promulgated Staff Assisted Rate Case Rule
 - Simplification – requires one (1) filed copy, instead of fourteen (14)
- 4 CSR 240-10.020 Income on Depreciation Fund Investments
 - Update – removes references and requirements that are no longer relevant
- 4 CSR 240-10.040 Service and Billing Practices for Commercial and Industrial Customers of Electric, Gas, Water and Steam Heat Utilities
 - Update – removes references that are no longer relevant
- 4 CSR 240-13.010 General Provisions

- Update – removes redundant language
- 4 CSR 240-13.015 Definitions
 - Clarifications
- 4 CSR 240-13.020 Billing and Payment Standards
 - Update – removes unnecessary language
- 4 CSR 240-13.025 Billing Adjustments
 - Update – proposed language allows flexibility
- 4 CSR 240-13.030 Deposits and Guarantees of Payment
 - Clarification
- 4 CSR 240-13.050 Discontinuance of Service
 - Simplification – removes the actual physician’s certificate from the rule
- 4 CSR 240-13.055 Cold Weather Maintenance of Service: Provision of Residential Heat-Related Utility Service During Cold Weather
 - Update – corrects an improper rule reference
 - Consolidation – adds the reporting requirements from Chapter 3
- 4 CSR 240-13.070 Commission Complaint Procedures
 - Clarification

Staff supports the proposed rule:

- 4 CSR 240-2.205 Variance and Waiver
 - Consolidation

Staff notes the rescission of 4 CSR 240-3.295, Submission Requirements Regarding Gas Utility Written Procedures for Conversion of Service and Upgrading, was included in this rulemaking in error. This rule was properly included in Case No. GX-2018-0279, and pursuant to Staff’s recommendation and the Commission’s Order of Rulemaking in that case, will be rescinded, effective January 30, 2019.