

5. 20 CSR 4240-28.011(2) states in relevant part:

(2) Any company with a certificate or registration that changes its name shall provide advance notice to the commission of the name change.

(A) Notice may be in the form of a letter signed by company official submitted into Electronic Filing and Information System (EFIS) as a new case submission containing the following information:

1. The new name of the company and date the new name takes effect;
2. Documentation that the new name is registered with the Missouri Secretary of State; and
3. A statement the company has reviewed and, if necessary, updated the company's contacts in EFIS.

6. In lieu of a Memorandum, Staff hereby states the Company has not changed its name nor seeking a name change pursuant to 20 CSR 4240-28.011(2), but is requesting authorization to use an additional name to market services within the State of Missouri. The Commission's authorization applies to one name and not multiple names; and therefore, if a company wants to operate under multiple names, then it should seek separate authorizations for each business name it wants to market services under. Furthermore, this minimizes confusion when it comes to ensuring company compliance with assessments and reporting requirements. No entities have intervened to oppose the fictitious name. There are no tariffs in this matter. The Company is not delinquent in any required filings with the Commission. On February 15, 2023 Staff contacted the company to withdraw this filing and file a service authorization application for Bullseye; however, to date, the company has not responded. Consequently, Staff requests the Commission deny the Company's request to use the additional fictitious name to market services and dismiss this matter. If the Company wants to use an additional name, then require the

Company to submit a new application requesting separate authorization pursuant to 20 CSR 4240-28,011(1) to provide services under the additional name it wants to provide services under.

WHEREFORE, Staff respectfully recommends the Commission deny the Company's request as it is not a name change and dismiss this matter as it is requesting the use of an additional name, and such requires a separate authorization under each name. Staff further requests the Commission grant such other and further relief as the Commission finds appropriate under the circumstances.

Respectfully submitted,

/s/ J. Scott Stacey

J. Scott Stacey
Senior Staff Counsel
Missouri Bar No. 59027
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-522-6279
573-751-9285 (Fax)
scott.stacey@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 2nd day of March, 2023.

/s/ J. Scott Stacey