

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

In the Matter of the Establishment of a Working Case)
For the Review and Consideration of a Rewriting and) **File No. AW-2018-0394**
Writing of Existing and New Affiliate Transaction)
Rules and HVAC Affiliate Transaction Rules)

**NOTICE OF THIRD DRAFT OF AFFILIATE TRANSACTIONS
AND HVAC AFFILIATE SERVICES RULES**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Notice of Third Draft of Affiliate Transactions and HVAC Affiliate Services Rules* in this matter hereby states:

1. The Commission opened this docket to assist its Staff in its review and consideration of new and existing rules regarding the treatment of affiliate transactions and HVAC (heating, ventilating, and air conditioning) affiliate transactions by and among electrical corporations, gas corporations, heating companies, water corporations with more than 8,000 customers, and sewer corporations with more than 8,000 customers.

2. Interested stakeholders filed comments and suggestions regarding Staff’s first set of draft rules on August 10, 2018, a workshop was held on October 9, 2018, in which the interested stakeholders provided further feedback on Staff’s draft rules, and Staff filed second version of its draft rules on September 16, 2019. On November 6, 2019, Staff submitted a red-lined version of its second set of draft rules, with explanations for each individual change, and interested stakeholders filed additional comments on December 9, 2019.

3. Staff has continued to review its proposed draft rules, and has compiled the additional comments and suggestions of the interested stakeholders; Staff now files in this docket a third version of its draft rules, which it believes is ready to proceed to the formal rulemaking process, reflecting proposed modifications based on its internal discussions and interested stakeholders’ most recent comments and suggestions.

4. As the Commission progresses towards a formal rulemaking, it would be useful to gather information from interested stakeholders on the costs, if any, of implementing Staff's proposed rules attached to this pleading. Staff would remind interested stakeholders, that while its proposed rules would constitute newly promulgated rules, the Commission currently has affiliate transaction rules applicable to electric, gas, and steam heat corporations, and thus, any costs or savings attributed to Staff's proposed rules by electric, gas, and steam heat corporations should be incremental in nature.

WHEREFORE, Staff prays the Commission will, by order or notice, invite interested stakeholders to file, no later than March 20, 2020, comments in this docket as to the costs, if any, of implementing Staff's proposed rules; and grant such other and further relief as the Commission considers just in the circumstances.

Respectively submitted,

/s/ Mark Johnson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 18th day of February, 2020, to all counsel of record.

/s/ Mark Johnson