

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

In the Matter of a Working Case to Consider a)	
Proposed Residential Customer Disconnection)	<u>File No. AW-2020-0148</u>
Data Reporting Rule)	

STAFF COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through Staff Counsel's Office, and states as follows:

1. On November 25, 2019, the Office of the Public Counsel ("Public Counsel") filed its *Motion to Open a Working Group Docket Regarding a Proposed Residential Customer Disconnection Data Reporting Rule* and included a draft proposed rule, memorandum, and other supporting documents. In its Order opening this working case, the Commission directed any stakeholder wishing to submit written comments regarding Public Counsel's rule proposal do so no later than February 14.

2. Staff has reviewed Public Counsel's draft proposed rule and incorporated documents and recommends the Commission consider Staff's attached revisions to Public Counsel's draft, provided in both track changes and clean formats. Staff's revisions include, among other things, promulgating the new rule in Chapter 13, modifying terms to be consistent with existing language in Chapter 13, and extending certain deadlines to facilitate the necessary data collection and compilation. Further, Staff recommends the new rule not include steam heating utilities. There are only two steam heating utilities in Missouri subject to the Commission's jurisdiction, and each of those two utilities serves a small, industrial customer base.

3. Staff has not proposed to exclude small sewer and water utilities from its attached revisions, however, Staff recommends the Commission and stakeholders

consider the impact of promulgating this reporting rule on small sewer and water utilities. Staff suggests that such a reporting requirement may be overly burdensome on utilities with uniquely small operations.

WHEREFORE, Staff submits these comments for the Commission's consideration.

Respectfully submitted,

/s/ Jamie S. Myers

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Missouri Public Service Commission

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 14th day of February 2020, to all counsel of record.

/s/ Jamie S. Myers