

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

In the Matter of the Establishment of a                    )  
Working Case for the Writing of a New Rule        )  
on the Treatment of Customer Information        )    File No.    AW-2018-0393  
by Commission Regulated Electric, Gas,        )  
Steam Heating, Water, and Sewer Utilities        )  
and Their Affiliates and Non-Affiliates

**MISSOURI-AMERICAN WATER COMPANY’S  
COMMENTS ON PROPOSED RULE**

Comes now Missouri-American Water Company (“MAWC” or “Company) and files its Response to the Commission’s Order Requesting Fiscal Note Comments (“Order”) and in support states as follows:

1. On July 19, 2023. Staff filed its Status Report and Request for Comments on Estimated Cost Impacts Regarding Draft Customer Information Rules indicating that the revised third draft of its proposed rules are ready for the Commission to begin the formal rulemaking process and requested that the Commission ask for additional comments regarding cost of compliance with Staff’s most recent draft.
2. On August 11, 2023, the Commission issued its Order giving any stakeholder who wished to provide comments regarding the costs that may be incurred to comply with the Staff’s draft rule to do so no later than September 11, 2023.
3. MAWC has reviewed this proposed rule, and MAWC believes given the time that has passed since the initial workshop and changes in the customer privacy concerns, at least one additional workshop on this rule would be beneficial to all stakeholders before it moves to an official rulemaking docket. It is a new rule that no utility has previously been required to comply with as written. This rule could require significant investment or changes in

operations that would be better to discuss with stakeholders outside of the time restraints included in an official rulemaking proposal.

4. As written, MAWC is unable to estimate the cost of compliance. MAWC believes that compliance with the proposed rule as written would require a one-time cost for programming and ongoing costs of employees, system maintenance and employee training. While MAWC is unable to estimate a dollar amount at this time, we would anticipate the additional costs to be material.

Wherefore MAWC asks the Commission to accept these Comments and any such relief the Commission deems appropriate.

Respectfully submitted,

MISSOURI-AMERICAN WATER COMPANY

/s/ Rachel L. Niemeier

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#### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or U.S. Mail on September 11, 2023 to the following:

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