

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

In the Matter of a Proposed Rulemaking	)	
Regarding Electric Utility Renewable	)	File No. EX-2010-0169
Energy Standard Requirements	)	

**COMMENT OF COMMISSIONER TERRY M. JARRETT**

COMES NOW Commissioner Terry M, Jarrett of the Missouri Public Service Commission and offers the following limited comment regarding the proposed rules. The definition of “Staff” in the proposed rule is vague, does not sufficiently define what Commission employees constitute the universe of “Staff” or provide any clear guidance with regard to the application of this term as defined.

Proposed rule 4 CSR 240-20.100(1)(R) sets out that “[S]taff means the staff of the Commission.” The Commissioners are appointees, not employees, of the Commission and as such could not be included in the definition of “Staff.” But, the proposed definition leaves open to interpretation, the inclusion or exclusion of every other commission employee as a member of “[S]taff. As such, I would propose that a complete definition of “Staff” be made, and propose the following:

(R) Staff means all commission employees, except the Secretary of the Commission, technical advisory staff as defined by Section 386.135 RSMo, hearing officer, or administrative or regulatory law judge.

This comment in no way shall limit my support or disapproval of the final rule when presented to the Commission for consideration, and this comment in no way constitutes prejudgment as to this rulemaking.

Respectfully submitted,



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Terry M. Jarrett, Commissioner

Submitted this 5<sup>th</sup> day of April, 2010.