

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

In the Matter of the Amendment                    )  
of the Commission’s Rule Regarding            )  
Stipulations and Agreements                    )            Case No. OX-2024-0255

**COMMENTS OF THE CONSUMERS COUNCIL OF MISSOURI**

Comes Now the Consumers Council of Missouri (“Consumers Council”) and hereby submits the following comments on the Commission’s proposed amendment to its stipulations rule.

Consumers Counsel does not object to the Commission’s proposed amendment, which requires specificity when a party objects to a non-unanimous stipulation. Providing specificity is simply good practice.

However, some utility comments have gone too far, attempting to suggest changes to the rule that are beyond the scope of this proceeding, and that would seriously infringe on the rights of intervening parties. This is why it is Consumers Council’s position that any formal rulemaking proposing a substantial change should be preceded by an informal workshop proceeding at the Commission, where such issues can be discussed in a collaborative manner.

First of all, such proposals by utility commentators are beyond the scope (PURPOSE paragraph) given for this rulemaking in the Missouri Register. Secondly, such changes suggested by utilities would go beyond subsection (2)(B) of the stipulations rule, which is the only subsection opened up by the Commission in this rulemaking. Thirdly,

such utility proposals would violate the Missouri court mandate that a party be given the opportunity for a full hearing on whatever issue it identifies, as laid out in State ex rel. James M. Fischer v. Public Service Commission, 645 S.W.2d 39 (Mo. Ct. App. 1983).

Consumers Council looks forward to making further comment at the public hearing on June 4, 2024.

Respectfully submitted,

Dated: May 31, 2024

/s/ John B. Coffman

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