



# Missouri Public Service Commission

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June 5, 1996

**DAVID L. RAUCH**  
Executive Secretary  
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**CECIL L. WRIGHT**  
Chief Administrative Law Judge  
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General Counsel

Mr. David L. Rauch  
Executive Secretary  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**FILED**  
JUN 5 - 1996  
MISSOURI  
PUBLIC SERVICE COMMISSION

**RE: Case No. AX-96-301 - In the matter of Proposed Rule 240-10.080 establishing Annual Report Filing Requirements**

Dear Mr. Rauch:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **COMMENTS OF STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Aisha Ginwalla  
Assistant General Counsel  
(573) 751-6726  
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AG/bsl

Enclosures

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED  
JUN 5 - 1996  
MISSOURI  
PUBLIC SERVICE COMMISSION

In the matter of Proposed Rule 240-10.080 )  
establishing Annual Report Filing )  
Requirements )

Case No. AX-96-301

**COMMENTS OF STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION**

COMES NOW the Staff of the Missouri Public Service Commission and submits the following comments in response to the Commission's proposed new rule 4 CSR 240-10.080. The proposed rule deals with annual report filing requirements.

1. The rule refers to the filing of "annual reports." Staff believes that the Commission should specifically state whether annual reports include fiscal-year reports. Currently, some companies submit their fiscal-year reports as annual reports. Staff does not have problems with this practice, but would like the Commission to clarify whether such practice is acceptable.

2. Paragraphs (2)-(6) of the proposed rule require regulated utilities to file their annual reports on forms provided by the Commission. Staff believes that utilities should also be given the option of filing their annual reports on computer-generated replica of forms provided by the Commission. This would ease the administrative burden and reduce the administrative cost for many utilities.

3. Paragraph (7) addresses the situation where a utility considers the information provided in its annual report to be confidential. In such circumstances, the Commission requires the utility to make a written request to the Executive Secretary to file that information under seal. Staff

believes the utility should be required to show good cause why the information should be treated as confidential and not as part of the public record.

4. Paragraph (8) directs utilities that are unable to meet the April 15 filing deadline to make a written request for an extension. Staff recommends that the Commission require any written request for an extension to be filed on or before April 1, 1996, or two weeks before the filing date. Also, the utility filing such a motion for extension should be required to show good cause for the late filing.

WHEREFORE, Staff respectfully requests the Commission to consider its recommendations.

Respectfully submitted,

*Aisha Gihwalla*

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### CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 5<sup>th</sup> day of June 5<sup>th</sup>, 1996.

*Aisha Gihwalla*

**Service List for Case No. AX-95-301**

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