

John R. Ashcroft

Secretary of State
Administrative Rules
RULE TRANSMITTAL

Administrative Rules Stamp

RECEIVED

By Administrative Rules SOS at 2:00 pm, Jul 31, 2024

Rule Number 20 CSR 4240-3.190

Use a "SEPARATE" rule transmittal sheet for EACH individual rulemaking.

Name of person to call with questions about this rule:

Content Nancy Dippell Phone 573-751-8518 FAX 573-526-6010

Email address Nancy.Dippell@psc.mo.gov

Data Entry Kayla Kliethermes Phone 573-751-4256 FAX 573-526-6010

Email address Kayla.Kliethermes@psc.mo.gov

Interagency mailing address Public Service Commission, 9th Floor Gov. Office Bldg, JC, MO

TYPE OF RULEMAKING ACTION TO BE TAKEN

Emergency Rulemaking __ Rule __ Amendment __ Rescission __ Termination

Effective Date for the Emergency _____

Proposed Rulemaking __ Rule X Amendment __ Rescission

Rule Action Notice In Addition Rule Under Consideration

Request for Non-Substantive Change

Statement of Actual Cost

Order of Rulemaking __ Withdrawal __ Adopt __ Amendment __ Rescission

Effective Date for the Order _____

Statutory 30 days OR Specific date _____

Does the Order of Rulemaking contain changes to the rule text? NO

YES—LIST THE SECTIONS WITH CHANGES, including any deleted rule text:

Small Business Regulatory
Fairness Board (DED) Stamp

JCAR Stamp

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By JCAR at 1:30 pm, Jul 31, 2024



Missouri Public Service Commission

MAIDA J. COLEMAN
Commissioner

KAYLA HAHN
Chair

JASON R. HOLSMAN
Commissioner

GLEN KOLKMEYER
Commissioner

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://psc.mo.gov>

JOHN P. MITCHELL
Commissioner

July 31, 2024

John Ashcroft
Secretary of State
Administrative Rules Division
600 West Main Street
Jefferson City, Missouri 65101

Re: 20 CSR 4240-3.190 Reporting Requirements for Electric Utilities and Rural Electric Cooperatives

Dear Secretary Ashcroft,

CERTIFICATION OF ADMINISTRATIVE RULE

I do hereby certify that the attached is an accurate and complete copy of the proposed amendment lawfully submitted by the Missouri Public Service Commission.

The Public Service Commission further certifies it has conducted an analysis of whether or not there has been a taking of real property pursuant to section 536.017, RSMo, that the proposed amendment does not constitute a taking of real property under relevant state and federal law.

The Public Service Commission has determined and hereby also certifies that if the proposed amendment does affect small business pursuant to sections 536.300 to 536.310, RSMo, a small business impact statement has been filed as required by those sections. If no small business impact statement has been filed the proposed amendment either does not affect small business or the small business requirements do not apply pursuant to section 536.300.4, RSMo.

Statutory Authority: *sections 386.250 and 394.160, RSMo 2016*

If there are any questions regarding the content of this proposed amendment, please contact:

Nancy Dippell
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102
(573) 751-8518
Nancy.Dippell@psc.mo.gov



Nancy Dippell

Nancy Dippell
Secretary

Enclosures



Missouri Public Service Commission

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Commissioner

KAYLA HAHN
Chair

JASON R. HOLSMAN
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JOHN P. MITCHELL
Commissioner

July 31, 2024

Sarah Schappe
Director
Joint Committee on Administration Rules
State Capitol, Room B8A
Jefferson City, Missouri 65101

Re: 20 CSR 4240-3.190 Reporting Requirements for Electric Utilities and Rural Electric Cooperatives

Dear Director Schappe,

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(573) 751-8518
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Nancy Dippell

Nancy Dippell
Secretary

Enclosures

STATE CAPITOL
201 W. CAPITOL AVENUE, ROOM 216
JEFFERSON CITY, MISSOURI 65101



(573) 751-3222
WWW.GOVERNOR.MO.GOV

Michael L. Parson

GOVERNOR
STATE OF MISSOURI

July 19, 2024

Ms. Kayla Hahn
Public Service Commission
PO Box 360
Jefferson City, MO 65102

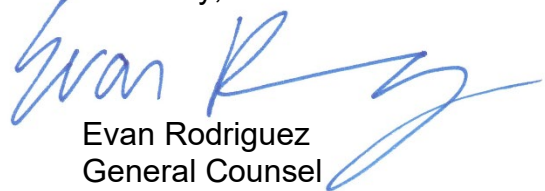
Dear Ms. Hahn:

This Office has received your Proposed Rule for the following regulation:

- 20 CSR 4240-3.190 Reporting Requirements for Electric Utilities and Rural Electric Cooperatives

Executive Order 17-03 requires this Office's approval before state agencies release proposed regulations for notice and comment, amend existing regulations, rescind regulations, or adopt new regulations. After our review, we approve the submission to the Joint Committee on Administrative Rules and the Secretary of State.

Sincerely,


Evan Rodriguez
General Counsel

**AFFIDAVIT
PUBLIC COST**

STATE OF MISSOURI)
)
COUNTY OF COLE)

I, Chlora Lindley-Myers, Director of the Department of Commerce and Insurance, first being duly sworn, on my oath, state that it is my opinion that the cost of proposed amendment, 20 CSR 4240-3.190, is less than five hundred dollars in the aggregate to this agency, any other agency of state government or any political subdivision thereof.

Chlora Lindley-Myers

Chlora Lindley-Myers
Director
Department of Commerce and Insurance

Subscribed and sworn to before me this 29th day of July, 2024 I am commissioned as a notary public within the County of Osage, State of Missouri, and my commission expires on March 30, 2027.

HAILEY LUEBBERT
NOTARY PUBLIC - NOTARY SEAL
STATE OF MISSOURI
MY COMMISSION EXPIRES MARCH 30, 2027
OSAGE COUNTY
COMMISSION #15634366

Hailey Lubbert

Notary Public



**FISCAL NOTE
PRIVATE COST**

- I. Department Title: Title 20--DEPARTMENT OF COMMERCE AND INSURANCE
Division Title: Division 4240—Public Service Commission
Chapter Title: Chapter 3—Filing and Reporting Requirements**

Rule Number and Title:	20 CSR 4240-3.190 Reporting Requirements for Electric Utilities and Rural Electric Cooperatives
Type of Rulemaking:	Proposed Amendment

II. SUMMARY OF FISCAL IMPACT

Estimate of the number of entities by class which would likely be affected by the adoption of the rule:	Classification by types of the business entities which would likely be affected:	Estimate in the aggregate as to the cost of compliance with the rule by the affected entities:
4	Investor-Owned Electrical Corporations	\$40,000
40	Rural Electric Cooperatives	\$0

III. WORKSHEET

The rule amendments will apply to four (4) electrical corporations (investor-owned electric utilities). Only the parts of the amendments applicable to the four (4) electrical corporations will have a fiscal impact.

The cost of compliance in the aggregate as follows:

- Initial cost of programming/automating processes to use a standardized template and related to leveraging metering infrastructure investment: \$10,000 per utility
- Ongoing costs are expected to be de minimis.

\$40,000 possible cost in the aggregate for the 10-year life of the rule.

The benefit of compliance to the commission:

- 56 hours saved * 8 rate cases * \$33.80/hour = \$15,142
- 56 hours saved * 20 rate cases * \$33.80/hour = \$37,856

Savings to the commission for the 10-year life of the rule between: \$15,142 - \$37,856.

IV. ASSUMPTIONS

As proposed, Section (2) requires each electrical corporation to utilize a standard template when reporting. Section (2)(E) requires reporting of certain data that leverages metering infrastructure investment.

The Commission Staff received information from Evergy Metro, Evergy Missouri West, Ameren Missouri, and Liberty-Empire.

For purposes of estimating aggregate costs of compliance, the Commission made the following assumptions:

- Ongoing costs are expected to be minimal as the amendment maintains the frequency and granularity of data reported as currently contained in the rule. Additionally, none of the electrical corporations reported a need for additional FTE as a result of the amendments.
- Initial costs are related to programming/automating reporting by the electrical corporations.
- Utility reported cost estimates varied greatly from one (1) utilities reporting \$0-\$305,000 and three (3) of the four (4) utilities reporting \$0-\$10,000. Higher cost estimates were based on concerns that the effective date of the rule would accelerate improvements to leverage advanced metering infrastructure investments. However, utilities may request a variance from the rule for good cause shown. Therefore, the Commission is assuming \$10,000 per utility.

For purposes of estimating benefits of compliance, the Commission made the following assumptions:

- The life of the rule is ten (10) years.
- Electric rate cases occur every two (2) to four (4) years per utility. Eight (8) to twenty (20) electric rate cases are expected to occur over the life of the rule.
- At least 56 hours of Commission Staff time per rate case will be saved as a result of the amendment.
- Hourly rate assumed to be \$33.80/hour.

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**Title 20—DEPARTMENT OF
COMMERCE AND INSURANCE
Division 4240—Public Service Commission
Chapter 3—Filing and Reporting Requirements**

PROPOSED AMENDMENT

20 CSR 4240-3.190 Reporting Requirements for Electric Utilities and Rural Electric Cooperatives.

The commission is amending sections (1), (2), (3), (4), (5), (6), and (8).

PURPOSE: This revision updates the requirements and procedures for the reporting of certain events by electric utilities to the commission. This revision updates the monthly reporting requirements regarding generation and load. This revision also updates the electrical facilities accident and event reporting requirements for rural electric cooperatives.

(1) [*Commencing on September 1, 1991, every*] **Every** electric utility shall accumulate **at least** the following information and submit it [*to the manager of the Energy Department of the commission, or his/her designee, no later than*] **monthly in the commission's electronic filing and information system (EFIS) by** the last [*business*] day of the month following the month to be reported [*and after that on a monthly basis*]:

[*(A) All generating unit outages and derates, excluding hydroelectric generating units and units whose capacity comprises less than one and one-half percent (1 1/2%) of the electric utilities accredited capacity*];

[*(B)*] **(A)** Monthly as-burned fuel report for each carbon-based fuel generating unit, including the amount of each type of fuel consumed, the British thermal unit (Btu) value of each fuel consumed, and the blending percentages (if applicable);

[*(C) Net system input for the electric utility;*

[*(D) Net hourly generation for each generating unit;*

[*(E) Megawatt amount and delivery prices of hourly purchases and sales of electricity from or to other electrical services providers, independent power producers, or cogenerators, including the parties to purchases and sales, and the terms of purchases and sales.*

1. If adjustments are made to the price of hourly purchases after the purchase is made, provide the amount of the adjustment and the time period over which the adjustment was made;

[*(F)*] **(B)** Capacity purchases of longer than seven (7) days' duration;

[*(G)*] **(C) Schedule of [P]planned outages of power production facilities** [, *as they are scheduled or rescheduled. Changes from the planned outage schedule must be reported by telephone or electronic transmission to the manager of the Energy Department of the commission or his/her designee prior to the initiation of the outage, if the changes result in the planned outage schedule being different from the schedule in the most recently submitted monthly report*];

[*(H)*] **(D) Schedule of [P]planned fuel test burns, unit heat-rate tests provided as a heat-rate curve, and accreditation runs with documentation of the results of all tests and runs.** [*as they are scheduled or rescheduled. Changes from previously planned fuel test burns, unit heat-rate tests, and accreditation runs must be reported by telephone or electronic transmission to the manager of the Energy Department of the commission or his/her designee prior to their initiation, if these changes result in the schedule for fuel test burns, unit heat-rate tests, and accreditation runs being different from the schedule in the most recently submitted monthly report*];

[*(I)*] **(E) Citations or notices of violation, and copies of the electric utility response, or a statement that no such citations or notices were received,** related to power production facilities received from any state or federal utility regulatory agency or environmental agency including, but not limited to, the Federal Energy Regulatory Commission (FERC), **the North American Electric Reliability Corporation (NERC)**, the Nuclear Regulatory Commission (NRC), the Environmental Protection Agency (EPA), the Department of Natural Resources (DNR), and the Department of Energy (DOE);

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[(J)] **(F)** The terms of new contracts or existing contracts which will be booked to Accounts 310–346 or Accounts 502–546 of the FERC’s Uniform System of Accounts requiring the expenditure by the electric utility of more than two hundred thousand dollars (\$200,000) including, but not limited to, contracts for engineering, consulting, repairs, and modifications or additions to an electric plant; **and**

[(K)] *Copies of all written reports on forced generating unit outages of longer than three (3) days, test burns of fuel, heat-rate tests, accreditation runs, and responses to state or federal utility regulatory agencies or environmental agencies including, but not limited to, the FERC, the NRC, the EPA, the DNR, and the DOE, concerning any alleged infractions, deviations, or noncompliance with those agencies’ rules or standards related to power production facilities*].

(G) If a utility provides notice of a generating unit retirement to a Regional Transmission Organization or an Independent System Operator, notice shall be provided to the commission in the applicable reporting month.

(2) *[The information required in subsections (1)(A) through (I) of this rule shall be provided [to the manager of the Energy Department of the commission or his/her designee in an electronic format from which the data can be easily extracted for analyses in spreadsheet or database software. All the information required in section (1) may be submitted through the commission’s Electronic Filing and Information System (EFIS).] Monthly reporting of hourly data.*

(A) Every electric utility shall accumulate the information described below and submit it monthly in EFIS on the last day of the month following the month to be reported:

1. All generating unit outages and derates for all units regardless of size, fuel type, or ownership share;

2. Net system input for the electric utility;

3. Hourly generation for each generating unit both including and excluding hourly station use;

4. Hourly day-ahead cleared generation, hourly real-time generation, and ancillary services for each generating unit;

5. Hourly day-ahead load and real-time load at each load node;

6. Total load for each hour by:

A. Wholesale load;

B. Sale for resale load; and

C. Retail load by:

(I) Rate code if customers taking service on a rate code are metered at a consistent voltage;
or

(II) Rate schedule for each voltage of service offered within each rate schedule; and

7. Megawatt amount and delivery prices of hourly purchases and sales of electricity from or to other electrical services providers, independent power producers, or cogenerators and small power producers, including any party to the purchase or sale, and the terms of the purchase or sale.

A. If adjustments are made to the price of hourly purchases after the purchase is made, provide the amount of the adjustment and the time period over which the adjustment was made.

(B) The information in this section shall be provided in an electronic format from which the data can be easily extracted for analysis in spreadsheet or database software using the templates provided by the commission.

(3) Incident Reporting.

(A) Every electric utility shall report [to the manager of the Energy Department of the commission or his/her designee by telephone or] through EFIS by the end of the first business day following discovery of an incident, the information described [in subsections (3)(A)–(E)] below [The electric utility shall submit, either by mail or through EFIS within five (5) business days following the discovery, an update of the incident and any details not available at the time of the initial report]:

[(A)] **1.** Details of any accident or event at a power plant involving serious physical injury or death or property damage in excess of two hundred thousand dollars (\$200,000)[.];

[1. A detailed investigative report of the accident or event shall be submitted within ninety (90) days, or if the investigation will take longer than ninety (90) days, a draft of the plan for the investigation shall be submitted within ninety (90) days;]

[(B)] **2.** Forced outages of any nuclear generating unit(s) that could reasonably be anticipated to last longer than three (3) days;

[(C)] **3.** Forced outages of any fossil-fuel fired generating unit(s) with an accredited capacity of greater than one hundred (100) megawatts that reasonably could be anticipated to last longer than three (3) days, when the unit(s) is forced out due to a common **or unforeseen** occurrence;

4. Forced outages of wind and solar generating plants when there is a loss of at least thirty percent (30%) of total installed capacity that reasonably could be anticipated to last longer than three (3) days, when the cause is due to a common or unforeseen occurrence;

[(D)] **5.** Reductions of coal inventory below a thirty (30)-day supply and reductions of oil inventory below fifty percent (50%) of normal oil inventory; and

[(E)] **6.** Loss of transmission capability that could limit the output of a generating plant **or the transfer capability into or out of the electric utility's system.**

(B) The electric utility shall submit, through EFIS within five (5) business days following the discovery, an update of the incident including any details not available at the time of the initial report.

(C) Incidents under subsection (3)(A)1. require a detailed investigative report which shall be submitted through EFIS within one hundred twenty (120) days.

(4) Electrical Contact Reporting.

(A) Every electric utility and rural electric cooperative shall notify designated commission personnel by telephone [of an accident or event] or in writing by the end of the first business day following the discovery [of any accident or event,] of any electrical contact, provided the utility or rural electric cooperative first has received proper notice or has actual knowledge of the [accident or event. Accidents or events that shall be reported shall be those resulting from—] electrical contact, described below:

[(A)] **1.** Electrical contact, arc, or flash with its energized electrical supply facilities **or at locations it supplies power** that results in admission to a hospital or the fatality of [*an employee or other person;*] **any person even when the source of the electric current is believed to have originated on the customer's side of the meter; or**

[(B) *Human contact with electric current of significant voltage at locations where it supplies power or operates energized electrical supply facilities that results in admission to a hospital or the fatality of an employee or other person, even when the source of the electric current is believed to have originated on the customer's side of the meter; or*]

[(C)] **2. Courtesy notifications may be provided regarding [A]any other electrical contact, arc, or flash considered significant by the electric utility or rural electric cooperative.**

(B) The electric utility or rural electric cooperative shall submit to designated commission personnel within ten (10) business days following the initial notification a written report consisting of any details not available at the time of the initial notification including information relevant to the circumstances of the incident. Relevant information may include the number of persons injured, type and extent of injuries, cause (if known), extent of any resulting outages, identification of the physical equipment of such electric utility or cooperative, a description of work being performed at the location, weather conditions, and the land use surrounding the scene of the incident.

(C) Electrical contact reporting may be made through EFIS or using the Missouri Public Service Commission Electrical Contact Reporting Form, incorporated by reference, as provided on the commission website (psc.mo.gov).

(D) Contact information for designated commission personnel is included on the electrical contact reporting form, incorporated by reference, as provided on the commission website (psc.mo.gov).

[*(5) The electric utility or rural electric cooperative shall submit to designated commission personnel within ten (10) business days following the discovery a written report consisting of an update of the accident or event and any details not available at the time of the initial telephone notification.*] **(E)** Neither the **initial notification** [*required by section (4), the submission of the written report required by this section,*] **or written report** nor the public availability of either shall be deemed to be an admission or waiver of any privilege of the notifying or reporting electric utility or rural electric cooperative.

(6) All reports and information submitted by electric utilities and rural electric cooperatives pursuant to this rule shall be subscribed by [*the president, treasurer, general manager, receiver, or other*] **an** authorized representative of the electric utility or rural electric cooperative having knowledge of the subject matter and shall be stated to be accurate and complete, and contain no material misrepresentations or omissions, based upon facts of which the person subscribing the report or information has knowledge, information, or belief.

(8) The information contained in the reports filed pursuant to this rule shall be subject to the provisions of section 386.480, RSMo, and the use of that information in any proceeding before the commission shall be governed by the terms of [*4 CSR 240-2.135*] **20 CSR 4240-2.135** and any protective order issued by the commission in the proceeding, if a protective order has been issued.

AUTHORITY: sections 386.250 and 394.160, RSMo [2000]2016. This rule originally filed as 4 CSR 240-3.190. Original rule filed Aug. 16, 2002, effective April 30, 2003. Amended: Filed Oct. 14, 2003, effective April 30, 2004. Amended: Filed Dec. 16, 2009, effective Aug. 30, 2010. Moved to 20 CSR 4240-3.190, effective Aug. 28, 2019. Amended: Filed July 31, 2024, effective _____.*

**Original authority: 386.250, RSMo 1939, amended 1963, 1967, 1977, 1980, 1987, 1988, 1991, 1993, 1995, 1996 and 394.160, RSMo 1939, amended 1979.*

PUBLIC COST: This proposed rule will not cost state agencies or political subdivisions over \$500 in the aggregate.

PRIVATE COST: This proposed rule will cost private entities \$40,000 in the aggregate.

NOTICE TO SUBMIT COMMENTS AND NOTICE OF PUBLIC HEARING: Anyone may file comments in support of or in opposition to this proposed rule with the Missouri Public Service Commission, Nancy Dippell, Secretary of the Commission, P.O. Box 360, Jefferson City, MO 65102. To be considered, comments must be received at the commission's offices on or before October 3, 2024, and should include a reference to Commission Case No. EX-2025-0034. Comments may also be submitted via a filing using the commission's electronic filing and information system at <http://www.psc.mo.gov/efis.asp>. A public hearing regarding this proposed rule is scheduled for October 11, 2024, at 10:00 a.m., in Room 305 of the Governor's Office Building, 200 Madison St., Jefferson City, Missouri. Interested persons may appear at this hearing to submit additional comments and/or testimony in support or in opposition to this proposed rule, and may be asked to respond to commission questions. Any persons with special needs as addressed by the Americans with Disabilities Act should contact the Missouri Public Service Commission at least ten (10) days prior to the hearing at one (1) of the following numbers: Consumer Services Hotline 1-800-392-4211 or TDD Hotline 1-800-829-7541.

Small Business Regulatory Fairness Board

Small Business Impact Statement

Date: June 24, 2024

Rule Number: 20 CSR 4240-3.190 Reporting Requirements for Electric Utilities and Rural Electric Cooperatives

Name of Agency Preparing Statement: Missouri Public Service Commission

Name of Persons Preparing Statement: Scott Stacey and Claire Eubanks

Phone Number: 573-522-6279
573-526-2953

Email: scott.stacey@psc.mo.gov
claire.eubanks@psc.mo.gov

Name of Persons Approving Statement: Jim Busch, Kim Bolin and Mark Johnson

Please describe the methods your agency considered or used to reduce the impact on small businesses (*examples: consolidation, simplification, differing compliance, differing reporting requirements, less stringent deadlines, performance rather than design standards, exemption, or any other mitigating technique*).

This rule amendment is being promulgated to modernize reporting requirements for electric utilities and rural electric cooperatives. This particular Commission reporting rule was last substantively amended effective August 2010. The portion of the rule applicable to rural electric cooperatives is related to the reporting of electrical contacts. The proposed rule language is simplified and allows for submittal of notifications through the Commission's electronic filing and information system.

In addition to electrical contact reporting, electrical corporations report certain data related to generation, market transactions, system load, and certain events that may affect the rendering of safe and adequate service. Since the August 2010 amendment, there have been significant changes in energy market operations, metering technology, coal plant retirements, and renewable additions.

Please explain how your agency has involved small businesses in the development of the proposed rule.

The Commission opened working case dockets, File No. EW-2021-0165, and provided notification to the Association of Missouri Electric Cooperatives (AMEC), which may include small businesses. Commission received numerous comments from electric utilities and met with individual utilities and AMEC. Comments were taken under

advisement in developing the amendments to this rule. Once the proposed amendment enters the formal rulemaking process, the Commission will seek additional input through a formal comment period and a rulemaking hearing. Commission proceedings are open to all interested stakeholders, including any small businesses.

Please list the probable monetary costs and benefits to your agency and any other agencies affected. Please include the estimated total amount your agency expects to collect from additionally imposed fees and how the moneys will be used.

No additional costs to the Commission are anticipated. However, it is expected that the proposed rule will result in benefit to the Commission and affected agencies because the rule enables the Commission to be informed of certain data and events that may impact future rate proceedings and the provision of safe and adequate service by the electrical corporations and rural electric cooperatives. No fees will be imposed.

Please describe small businesses that will be required to comply with the proposed rule and how they may be adversely affected.

Electrical corporations and rural electric cooperatives will be required to report certain information under the amendment. The Commission rate-regulates four electrical corporations and regulates approximately 40 rural electric cooperatives in regards to safety. The frequency and granularity of reporting requirements has not changed from the existing rule.

In regards to reporting applicable to electrical corporations, the amendment requires the transfer of data conforming to a standardized template. Additionally, the amendment leverages metering infrastructure investments made by the electrical corporations as encouraged by Section 393.1400, RSMo. While the effective date of the rule amendment may accelerate projects contemplated by the electrical corporations, the existing rule allows the granting of variances for good cause shown. The use of a standardized template may require initial set-up by the electrical corporations. Total for all four electrical corporations is expected to be \$40,000.

In regards to reporting requirements applicable to both rural electric cooperatives and electrical corporations, the amendment simplifies language and allows for reporting through the Commission's electronic filing and information system. No adverse impact is expected from the amendment related to electrical contact reporting to either rural electric cooperatives or electrical corporations.

See the attached fiscal notes.

Please list direct and indirect costs (in dollars amounts) associated with compliance.

Direct costs will be the costs as stated above and in the attached fiscal note. The Commission is not aware of any indirect costs associated with compliance with the amendment.

Please list types of business that will be directly affected by, bear the cost of, or directly benefit from the proposed rule.

While the exact costs are unknown at this time, the types of businesses impacted will be electrical corporations and rural electric cooperatives. It is anticipated that the electrical corporations will be reimbursed for prudently incurred costs through rates.

Does the proposed rule include provisions that are more stringent than those mandated by comparable or related federal, state, or county standards?

Yes ___ No X

If yes, please explain the reason for imposing a more stringent standard.

For further guidance in the completion of this statement, please see §536.300, RSMo.