

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Commission’s)
Proposed Rule 20 CSR 4240-10.175)
Relating to Customer Information of) **File No. OX-2025-0106**
Electrical Corporations, Gas)
Corporations, Heating Companies,)
Certain Water Corporations and Certain)
Sewer Corporations)

COMMENTS OF SIERRA CLUB
REGARDING PROPOSED RULE 20 CSR 4240-10.175

COMES NOW Sierra Club and submits these Comments on proposed rule 20 CSR 4240-10.175 as follows:

1. Sierra Club is a nonprofit organized and existing under the nonprofit corporation laws of the State of California. Sierra Club has roughly 650,000 members nationwide and approximately 9,500 members in Missouri.

2. Sierra Club exists for the purpose of preserving and protecting environmental values. Sierra Club is concerned with emissions of greenhouse gases that cause climate change, and with pollution from non-renewable sources that cause a host of health issues including asthma, mercury poisoning, sudden infant death syndrome, and respiratory problems, among others. Consistent with this mission, Sierra Club has long advocated for transitioning the electricity sector from coal- and gas-burning generation to cleaner and lower cost forms of energy, such as energy efficiency, renewable energy sources, and energy storage. Further, Sierra Club works with a host of community partners to address the energy burden, or high percentage of income commonly spent on energy bills, that particularly impacts people living in Black and Latinx communities.

3. As part of its energy burden advocacy work Sierra Club and its partners rely on aggregated customer data to determine energy burden based on census tract. In its current form,

the proposed rule will interfere with the ability of Sierra Club and other community action groups to access aggregated customer data, and will therefore, cause harm to those who are already most impacted by energy burden.

4. Sierra Club supports many of the changes to the proposed rule that are being offered by the Office of Public Counsel. Sierra Club believes that OPC's proposed modifications will clarify the data protections and transparency customers deserve. However, the proposed rule allows utilities to charge for access to aggregated customer data, which will reduce the ability of Sierra Club and other community action agencies to access that data. Community action agencies benefit from being able to use aggregated customer data in order to target their outreach to those most in need, and such agencies are already underfunded and struggling. The Commission should be making it easier, not harder, to help those who need it most. To rectify these concerns, Sierra Club proposes eliminating the proposed rule's allowance for utilities to charge for the costs of producing customer data.

5. Attached hereto is a redlined version of the proposed rule incorporating additional modifications Sierra Club believes to be necessary to protect its energy burden work. These additional changes seek to clarify that utilities may not charge for access to customer data.

WHEREFORE, Sierra Club asks that the Commission take these comments and the accompanying materials into consideration as it deliberates its final Order of Rulemaking.

Respectfully Submitted,

GREAT RIVERS ENVIRONMENTAL
LAW CENTER

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