

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

In the Matter of the Commission’s )  
Proposed Rule 20 CSR 4240-10.175 )  
Relating to Customer Information of )  
Electrical Corporations, Gas )  
Corporations, Heating Companies, )  
Certain Water Corporations and Certain )  
Sewer Corporations )

**File No. OX-2025-0106**

**RENEW MISSOURI ADVOCATE’S RESPONSE TO THE COMMISSION’S PROPOSED  
RULE 20 CSR 4240-10.175 RELATING TO CUSTOMER INFORMATION OF  
ELECTRICAL CORPORATIONS, GAS CORPORATIONS, HEATING COMPANIES,  
CERTAIN WATER CORPORATIONS AND CERTAIN SEWER CORPORATIONS**

COMES NOW, Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) and responds to the Commission’s proposed rule 20 CSR 4240.10.175 **Customer Information of Electrical Corporations, Gas Corporations, Heating Companies, Water Corporations, and Sewer Corporations** as follows:

1. Renew Missouri has suggestions that it believes will further improve the rule by adding clarity, protecting not-for profit groups’ interest in receiving aggregated data to complete energy burden work to provide vital information about how utility bills impact every day Missourians, the ability of customers to utilize informed consent procedures to share data and participate in third party aggregation efforts or otherwise effectuate FERC Order 2222, and well as provide clear information to customers on what information can be shared, and with whom.

2. In its attachment to this pleading, Renew Missouri is presenting those suggestions through proposed revisions to the proposed rule the Commission published. Renew Missouri's proposed revisions are shown by accepting the Commission's rule as proposed, then making proposed further additions with underlined blue text. Rationales for changes which may not be obvious are provided by comments in the attachment.
3. Renew Missouri suggests that a definition of aggregated customer information may not be necessary, as including such a definition is increasingly viewed as obsolete – it is neither useful nor sufficiently protective of privacy. “Reidentification risk” is a complex topic, particularly with AMI data, and Renew Missouri cautions against enshrining a definition into the rules.<sup>1</sup> However, if the Commission believes a definition of aggregated customer information is appropriate, Renew Missouri has included its suggestions on what such language could entail.

**WHEREFORE**, Renew Missouri respectfully provides its comment regarding the Commission's proposed rule, CSR 4240.10.175 **Customer Information of Electrical Corporations, Gas Corporations, Heating Companies, Water Corporations, and Sewer Corporations.**

Respectfully,

*/s/ Nicole Mers*

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<sup>1</sup> <https://edp.recurve.com/regulatory-guide.html>

GENERAL COUNSEL FOR RENEW  
MISSOURI ADVOCATES

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to all counsel of record this 1st day of December 2024.

*/s/ Nicole Mers*