

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

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

COMMENTS OF WILLIAM D. STEINMEIER

COMES NOW William D. Steinmeier, as an interested citizen, and offers these comments on this proposed Customer Information rule.

It is not unusual today for a typical citizen – an “average person” – to receive one or more written notices, per year, that some organization in possession of that citizen’s personally identifiable information has been hacked and the citizen’s information placed at risk of being used by a con artist or other malevolent individual or entity, to the innocent citizen’s potential financial and personal detriment. Such organizations include retail businesses, doctor’s offices, hospitals, credit card companies, banks and government agencies, among others. And utility companies,

Such a theft of personally identifiable customer information is what is called a “breach of security” under Section 407.1500.1, RSMo. Sadly, such “breaches” have become rather commonplace today.

When such unauthorized disclosures of personal information occur, the affected, innocent citizen risks that his or her personal information will be used for malicious purposes, including identification theft or title theft. He or she must decide whether to

employ some credit monitoring program (sometimes offered free of charge for a year or two by the “breaching” entity), join in some class-action lawsuit, or take other measures to try to protect against financial and personal harm resulting from the organization’s inability to adequately protect the personal information that was in the possession of the breaching entity.

Against that backdrop, the less information any utility company is allowed to procure and maintain from a customer, the better. Further, the less customer information that the utility company is permitted to share with any other entity, the better.

The proposed rule suffers from a dearth of definitional clarity. This increases the possibility of misuse of customer information while the rule’s meaning is being adjudicated and clarified by the Commission and the courts on a case-by-case basis.

I recommend that the Commission seriously consider the redline proposal of the Office of Public Counsel in lieu of the rule as proposed. That version adds important protections of individual customer information with more definitional clarity than the proposed rule.

As a final non-substantive but procedural point, I would hope that in the future the Commission would assiduously avoid setting deadlines for comments on the Sunday at the end of Thanksgiving weekend.

I am grateful for the Commission's consideration of these comments.

Respectfully submitted,

/s/ William D. Steinmeier

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