

(3) Notice Requirements. From November 1 through March 31, prior to discontinuance of service due to nonpayment, the utility shall—

(C) Attempt to contact the customer at the time of the discontinuance of service in the manner specified by 4 CSR 240-13.050(9);

(15) Each utility providing heat-related utility service shall submit as a non-case related filing a report with the commission for each calendar month no later than the twentieth (20th) day of the following month. The utility shall provide a copy of each report to the Office of the Public Counsel. The utility shall report for each operational district into which the utility has divided its Missouri service territory the number of days it was permitted to discontinue service under this regulation, and the utility shall separately report on the information listed below for customers receiving energy assistance and customers who are affected by this regulation and not known to be receiving energy assistance. All information submitted shall be considered public information; however, no customer-specific information shall be reported or made public. Utilities providing both electric and gas service shall report the following information separately for their gas-only territory:

(A) How many customers were—

1. Disconnected, at the end of the period;
2. Of those disconnected, how many customers had service discontinued for nonpayment during the period; and
3. Of those discontinued during the period, how many customers were restored to service during the period;

(B) Of customers reported as disconnected at the end of the period—

1. How many had broken a cold weather rule pay agreement;
2. How many had broken a non-cold weather rule pay agreement; and
3. How many had not been on a pay agreement;

(C) Of those customers reconnected during the period—

1. How many customers received energy assistance (pledged or paid) from—

A. Low Income Home Energy Assistance Program (LIHEAP);

B. Energy Crisis Intervention Program (ECIP); and

C. Other services known to the utilities; and

2. How much energy assistance was provided by—

A. LIHEAP;

B. ECIP;

C. Other sources known to the utility; and

D. Customer;

(D) Of customers restored to service during the period—

1. How many were put on a cold weather rule pay agreement; and

2. How many were put on a non-cold weather rule pay agreement;

(E) How much was owed by those disconnected at the end of the period—

1. How much was owed by those disconnected during the period; and

2. How much was owed by those reconnected during the period;

(F) How many customers were registered under this regulation at the end of the period—

1. How many customers registered during the period; and
2. How many of such registered customers had service discontinued during the period;

(G) For how many customers during the period did the utility receive—

1. LIHEAP;

2. ECIP; and

3. Other assistance known to the utility;

(H) How much cash did the utility receive on behalf of customers during the period from—

1. LIHEAP;

2. ECIP; and

3. Others known to the utility;

(I) How many customers who requested reconnection under terms of this rule were refused service pursuant to this regulation;

(J) How many customers received energy assistance insufficient in amount to retain or restore service; and

(K) The number of customers who agreed to pay for their heat-related utility service under a payment agreement in accordance with this regulation.

Title 4—DEPARTMENT OF ECONOMIC DEVELOPMENT

Division 240—Public Service Commission

Chapter 13—Service and Billing Practices for Residential Customers of Electric, Gas, Sewer, and Water Utilities

ORDER OF RULEMAKING

By the authority vested in the Public Service Commission under sections 386.250(6) and 393.140(11), RSMo 2016, the commission amends a rule as follows:

4 CSR 240-13.070 Commission Complaint Procedures is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on December 17, 2018 (43 MoReg 3774). No changes have been made in the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended January 16, 2019, and the commission held a public hearing on the proposed amendment on January 29, 2019. The commission received timely written comments in support of the amendment from Travis J. Pringle, Legal Counsel, on behalf of the staff of the commission.

COMMENT #1: Staff made comments supporting the amendment of this rule indicating that this change adds clarification to the rule. Staff stated that this rulemaking was undertaken in response to Executive Order 17-03 and is being proposed in order to streamline, simplify, and improve the user-friendliness of the commission's regulations.

RESPONSE: No change was made as a result of this comment.

Title 4—DEPARTMENT OF ECONOMIC DEVELOPMENT

Division 240—Public Service Commission

Chapter 20—Electric Utilities

ORDER OF RULEMAKING

By the authority vested in the Public Service Commission under sections 386.250 and 393.292, RSMo 2016, the commission amends a rule as follows:

4 CSR 240-20.070 Decommissioning Trust Funds is amended.

A notice of proposed rulemaking containing the text of the proposed amendment was published in the *Missouri Register* on December 17, 2018 (43 MoReg 3774-3776). No changes have been made in the text of the proposed amendment, so it is not reprinted here. This proposed amendment becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended

January 17, 2019, and the commission held a public hearing on the proposed rule on January 28, 2019. The commission received timely written comments in support of the amendment from Travis J. Pringle, Legal Counsel, on behalf of the staff of the commission and Paula N. Johnson, Senior Corporate Counsel, on behalf of Union Electric Company d/b/a Ameren Missouri (Ameren Missouri). The commission received comments at the hearing in support of the amendment from Jamie Myers, Commission Staff Deputy Director, on behalf of the staff of the commission (staff), and Jim Fischer, Fischer & Dority, PC, on behalf of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (collectively referred to as KCP&L/GMO).

COMMENT #1: Staff made general comments supporting the amendment of this rule by transferring provisions from 4 CSR 240-3.185. Staff stated that this rulemaking was undertaken in response to Executive Order 17-03 and is being proposed in order to consolidate, streamline, and improve the user-friendliness of the commission's regulations.

RESPONSE: The commission appreciates its staff's dedication to improving the regulatory process at the commission and in the state of Missouri. No change was made as a result of this comment.

COMMENT #2: Ameren Missouri filed written comments in support of amending this rule by consolidating 4 CSR 240-3.185 into it. **RESPONSE:** The commission thanks Ameren Missouri for its participation in this rulemaking process. No change was made as a result of this comment.

COMMENT #3: KCP&L/GMO, commented at the hearing that KCP&L/GMO were in agreement with Ameren Missouri's comments.

RESPONSE: The commission thanks KCP&L/GMO for their participation in this rulemaking process. No change was made as a result of this comment.

**Title 4—DEPARTMENT OF ECONOMIC
DEVELOPMENT
Division 240—Public Service Commission
Chapter 20—Electric Utilities**

ORDER OF RULEMAKING

By the authority vested in the Public Service Commission under sections 386.250 and 393.140, RSMo 2016, the commission adopts a rule as follows:

4 CSR 240-20.105 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on December 17, 2018 (43 MoReg 3776–3779). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended January 17, 2019, and the commission held a public hearing on the proposed rule on January 28, 2019. The commission received timely written comments in support of the rule from Travis J. Pringle, Legal Counsel, on behalf of the staff of the commission, Caleb Hall, Attorney, on behalf of the Office of the Public Counsel (OPC), and Paula N. Johnson, Senior Corporate Counsel, on behalf of Union Electric Company d/b/a Ameren Missouri (Ameren Missouri). Mr. Hall and Ms. Johnson also suggested changes to some rule provisions. The commission received comments at the hearing in support of the rule from Jamie Myers, Commission Staff Deputy Director, and Robin Kliethermes, Rate and Tariff Examination Manager, on

behalf of the staff of the commission (staff), Mr. Hall on behalf of OPC, Ms. Johnson on behalf of Ameren Missouri, and Jim Fischer, Fischer & Dority, PC, on behalf of Kansas City Power & Light Company and KCP&L Greater Missouri Operations Company (collectively referred to as KCP&L/GMO).

COMMENT #1: Staff gave general comments supporting the rule and the transfer of the provisions of 4 CSR 240-3.145 to this rule. Staff stated that this rulemaking was undertaken in response to Executive Order 17-03 and is being proposed in order to consolidate, streamline, and improve the user-friendliness of the commission's regulations. Specifically, with regard to this new rule, staff stated that there were several references to the 1913 statute and to providing fourteen (14) paper copies of filed documents in 4 CSR 240-3.145 that the commission removed to clean up and simplify this rule.

RESPONSE: The commission appreciates its staff's dedication to improving the regulatory process at the commission and in the state of Missouri. No change was made as a result of these comments.

COMMENT #2: OPC commented that the word "generating" in section (1) should be changed to "generation." Staff of the commission agreed with OPC that this change should be made.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees that the verb "generating" should be changed to the noun "generation" in section (1). Therefore, the commission amends section (1) by changing that word and adds a comma after the word "furnishing" in that list.

COMMENT #3: Ameren Missouri filed written comments and commented at the hearing in support of most of this rule. Ameren Missouri stated that the proposed rule updates the regulations by removing references dating back to 1913 and consolidates the provisions of 4 CSR 240-3.145 into this rule which makes the commission's regulations as a whole more logically organized. KCP&L/GMO agreed with these comments.

RESPONSE: The commission thanks Ameren Missouri and KCP&L/GMO for their participation in this rulemaking process. No change was made as a result of this comment.

COMMENT #4: Ameren Missouri commented that sections (2) and (21) and subsection (8)(G) should be amended to remove the requirements to keep and make accessible to the general public, a paper copy of its rate schedules in each of its offices. Ameren Missouri stated that for security and practical reasons electrical corporations should no longer be required to do this, and that customers now have access to the rate schedules via the internet. Ameren Missouri further commented that a customer would not receive any trained help with understanding the rates and schedules if that person was at an office building or pay station because customer service representatives would only be available by telephone. Ms. Johnson stated that she had asked other Ameren Missouri employees, and no one could remember an occasion when a customer had asked to see the rate schedules in person. Ameren Missouri proposed new language that would require the electrical corporations to only publish their rate schedules on their websites and to provide customer service assistance by telephone. KCP&L/GMO agreed with and supported Ameren Missouri's comments.

Staff disagreed with this proposed change stating that the requirement was not a burden for the electrical corporations and there could be a customer without internet access who would want to access the paper tariff. OPC agreed with staff that the requirement should stay in the rule.

RESPONSE AND EXPLANATION OF CHANGE: The commission finds that, although this is not a large burden on the electrical corporations, they should not be required to maintain a paper copy of their rate schedules at every pay station and branch office. However, the commission finds that it is reasonable to require electrical corporations to maintain a paper copy and make it accessible to customers

who request it at the corporation's main or principal Missouri office. The commission will also adopt Ameren Missouri's suggestion that the electrical corporations keep their rate schedules on their websites and provide customer service representatives by telephone. Therefore, the commission will amend section (2) by rewriting it and delete subsections (2)(A), (2)(B), and (2)(C). The Commission makes no changes to subsection (8)(G) or section (21) as the result of this comment.

COMMENT #5: Ameren Missouri commented that section (5) and subsection (9)(C) should be amended to update the classification of service types. Ameren Missouri stated that customers will typically look for their service rates under the designations of "residential" and "non-residential." Ameren Missouri further stated that the "non-residential" category should have further categories such as small or large general service, small or large primary service, and street lighting either company-owned or customer-owned. Ameren Missouri further commented that the requirement that battery charging automatically be designated as commercial was outdated. Because of progress in battery and battery charging technologies, it may now be applicable to residential customers. Ameren Missouri provided proposed language. KCP&L/GMO agreed with Ameren Missouri's comments. At the hearing, staff agreed with Ameren Missouri that the categories should be updated, but proposed that the categories in section (5) should be made more general so that they would be applicable to all Missouri electrical corporations and not just the specific categories that Ameren Missouri has in its rate schedules. Ameren Missouri indicated agreement with staff's proposed broad rate schedule categories. Staff also agreed with Ameren Missouri's proposed change to subsection (9)(C).

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with the service category changes proposed by staff. Therefore, the commission amends section (5) and subsection (9)(C) and deletes subsections (5)(A), (5)(B), and (5)(C).

COMMENT #6: Ameren Missouri suggested deleting the requirement to have a title page and references to the title page on the rate schedules found in sections (7), (8), and (9). Ameren Missouri made these suggestions because it believes title pages are no longer necessary when viewing the rate schedule electronically. Ameren Missouri also suggested changes to subsections (8)(D), (8)(E), (8)(F), and (8)(G) because the specific terms used there were outdated and unnecessary. Additionally, because Ameren Missouri believes that no electrical corporation will file a paper copy of its rate schedules, the term "loose leaf" can be removed from sections (8), (13), and (16) and subsection (8)(G). Finally, Ameren Missouri suggested that the words "printed" and "reissued" be changed to "published" to remove the paper connotation. KCP&L/GMO agreed with Ameren Missouri's comments. Staff stated that it believed there is still value to having a title page, especially when staff provides a paper copy to someone. Staff also believes that the title page requirements and the tariff formatting requirements in subsections (8)(D), (8)(E), and (8)(F) should stay the same so that the regulations for rate schedules will be consistent across industries and companies. Staff agrees, however, that the term "loose-leaf" should be removed. Staff disagreed with removing the "printed" and "reissued" and suggested adding "and/or published" to those phrases. Ameren Missouri agreed with staff's suggestion.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with staff that the title page and other formatting requirements for rate schedules should not be deleted in order to maintain consistency across industries and companies within industries. The commission also agrees that the term "loose leaf" should be deleted from sections (8), (13), and (16) and subsection (8)(G). The commission will also adopt "published" in place of "printed" and "reissued" in section (13) in order to update the language for electronic filing and to remove the suggestion that a rate schedule amendment must be physically printed. Finally, the commission will delete a sen-

tence in section (16) regarding how paper copies shall be filed, because it is no longer necessary when receiving a paper copy. The commission amends sections (13) and (16) and subsection (8)(G).

COMMENT #7: Ameren Missouri commented that the reference to section (16) in section (18) was incorrect and should be a reference to section (15). Staff and KCP&L/GMO agreed.

RESPONSE AND EXPLANATION OF CHANGE: The commission will correct the section reference in section (18).

COMMENT #8: Ameren Missouri commented that the word "less" should be changed to "fewer." In section (21). Staff agreed.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with the correction and will change "less" to "fewer" in section (21).

COMMENT #9: OPC commented that section (22) refers to municipalities being responsible for filing schedules of rates and supplements. OPC stated this language is a reprint of part of 4 CSR 240-3.145 that is being incorporated in this new rule. However, no other part of the rule refers to municipalities. Therefore, he suggests that this language be removed, or that the commission add municipalities to the remainder of the rule if that was what was intended. Staff of the commission agreed with OPC that this change should be made.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with OPC that the reference to municipalities is in error and should be removed. Therefore, the commission will delete that reference from section (22).

COMMENT #10: Ameren Missouri commented that all electrical corporations use the commission's Electronic Filing and Information System (EFIS) rather than paper filings and, therefore, section (24) can be updated to remove references to postage and items being held by the post office. Ameren Missouri also suggested adding language regarding when a filing is not received because of a server or other electronic issue attributable to the commission or EFIS. KCP&L/GMO agreed with Ameren Missouri's comments.

Staff disagreed that Ameren Missouri's changes should be made. Staff stated that there is value to having the rule language and the methods of filing rate schedules consistent among the various industries that the commission regulates. Staff commented that even though electrical corporations usually file electronically, it is possible that the commission will receive filings via the U.S. Postal Service. Staff also commented that the proposed language regarding electronic errors was not necessary. Staff agreed with Ameren Missouri that some clean-up of the language was needed in order to remove a reference to "telegraphic notices."

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with staff that the rule should be consistent with the methods of filing for other industries. Additionally, because these rules do not require electronic filing, a provision for receiving filings through the U.S. Postal Service should remain in the rule. Further, the commission is unaware of problems due to the absence of a rule stating when filings are deemed received if there is an electronic error attributable to the commission when a filing is made. Absent issues being present, the commission will not adopt Ameren Missouri's proposed additions to section (24). The commission will, however, update section (24) by deleting the sentence referring to "telegraphic notices."

COMMENT #11: Ameren Missouri commented that section (28) should be updated to allow for electronic filing of rate schedules and section (29) should be amended to remove the phrase "in duplicate if receipt is desired." Staff and KCP&L/GMO agreed with Ameren Missouri's proposed change.

RESPONSE AND EXPLANATION OF CHANGE: The commission finds that section (28) should be updated to allow electronic filing of rate schedules. However, because paper copies will still be

accepted, the commission will not delete the requirement to provide a duplicate if a paper receipt is desired. The commission will clarify that phrase to make it applicable only to paper receipts as electronic copies will be available in EFIS. Therefore, the commission rewrites sections (28) and (29).

4 CSR 240-20.105 Filing Requirements for Electric Utility Rate Schedules

(1) Every electrical corporation, as defined in section 386.020, RSMo, engaged in the manufacture, generation, furnishing, or transmission of electricity for light, heat, or power within Missouri is directed to have on file with this commission a schedule of all rates, rentals, and charges of whatever nature made by the electrical corporation for each kind of service it renders which are in force, together with proper supplements covering all changes in rate schedules authorized by this commission, if any.

(2) Every electrical corporation is directed to keep a paper copy of its rate schedules approved by this commission in its main or principal Missouri operating office and to make those rate schedules readily accessible to the public upon demand during regularly scheduled business hours of that office. Every electrical corporation shall also publish a currently effective rate schedule on its website and make the electronic schedule readily available to the public. The electrical corporation shall provide access in person or by telephone during regular business hours to customer service representatives who can aid customers in determining accurately the rate or charge applicable to any particular kind of electrical service.

(8) The title page or sheet of every schedule of rates shall show—

(G) On the upper left-hand corner of a schedule of fewer than three (3) pages the words, “No supplement to this tariff will be issued except for the purpose of canceling this tariff.” A schedule of three (3) or more pages shall include the words, “Only one (1) supplement to this schedule will be in effect at any one (1) time”; and

(9) The schedule shall contain in the order named—

(C) Classification of Service. Under this heading the kind of service separately grouped for Residential and Non-Residential will be set forth in the order named together with a detailed statement of the rate(s) in connection with same. A definite separation must be made between prompt payment discount and quantity discount and stating the manner in which they are computed clearly. If guarantees of any nature are required or a minimum charge made, the principles upon which they are based must be stated. In this case give the company's charges or deposits for meters. If penalties for delayed payments are exacted, the same must be stated. State whether current is estimated or metered and, if so, how. State the company's practice in regard to lamp renewals. If a charge is made to the consumer for installing and connecting the service wires, this should be stated. State the character of the service, whether twenty-four- (24-) hour or limited until midnight, whether the service is limited to certain hours of the day, on-peak, off-peak, optional service, auxiliary service, breakdown service, and the like. The kind of current, such as alternating or direct, together with the voltage, phase, and frequency must be given in all cases;

(13) A change in a schedule shall be known as an amendment and shall be published in a supplement to the schedule which it amends, specifying the schedule by its PSC number. The supplement shall be republished each time an amendment is made and shall always contain all the amendments to the schedule that are in force. Supplements to schedules shall be numbered consecutively as supplements to the schedules and shall not be given new or separate PSC numbers. An amendment must always be published in the supplement in its entirety as amended.

(16) All changes in and additions to schedules issued in paper must be made by reprinting the sheet upon which the change is made. Those pages or sheets shall not be given supplement numbers, but must be designated “First revised page or sheet,” “Second revised page or sheet,” and the like and must show the name of the issuing corporation and the PSC number of the schedule, the issued and effective dates, and the name, title, and address of the officer by whom issued.

(18) The provisions of section (15) of this rule as to the number of supplements to a schedule that may be in effect at any time and the volume of supplemental matter they may contain need not be observed in connection with a supplement issued under sections (14)-(18) of this rule.

(21) All changes in rates, charges, or rentals or in rules that affect the rates, charges, or rentals shall be filed with the commission at least thirty (30) days before the date upon which they are to become effective. The title page of every rate schedule or supplement and the reissue on any page or sheet must show a full thirty (30) days' notice except as otherwise provided in this rule. The proposed change shall be accompanied by a brief summary, approximately one hundred (100) words or fewer, of the effect of the change on the company's customers. A copy of any proposed change and summary shall also be served on the public counsel and be available for public inspection and reproduction during regular office hours at the general business office of the utility.

(22) Each electrical corporation has the duty of filing with the commission all its schedules of rates and supplements or any rule relative to them which may be announced by the commission, under penalty for failure to do so. The commission will give consistent assistance as it can in this respect, but the fact that the receipt of a rate schedule or a supplement to a rate schedule is acknowledged by the commission, or the fact that a rate schedule or supplement to a rate schedule is in the files of the commission, will not serve or operate to excuse the electrical corporation from its responsibility or liability for any violation of the law or of any ruling lawfully made which may have occurred in connection thereunder with the construction of filing of a rate schedule or supplement.

(24) Except as is otherwise provided, no schedule or supplement will be accepted for filing unless it is delivered to the commission free from all charges or claims for postage, the full thirty (30) days required by law before the date upon which the schedule or supplement is stated to be effective. No consideration will be given to or for the time during which a schedule or supplement may be held by the post office authorities because of insufficient postage. When a schedule or a supplement is issued and as to which the commission is not given the statutory notice, it is as if it had not been issued and a full statutory notice must be given of any reissue. In these cases the schedule will be returned to the sender and correction of the neglect or omission cannot be made which takes into account any time elapsing between the date upon which that schedule or supplement was received and the date of the attempted correction. For rate schedules and supplements issued on short notice under special permission of the commission, literal compliance with the requirements for notice named in any order, regulation, or permission granted by the commission will be exacted.

(28) Electrical corporations shall file any rate schedule, supplement, or other charges or regulations with the commission via the Electronic Filing and Information System (EFIS), or if filing a paper copy, to transmit or hand-deliver one (1) copy of each rate schedule, supplement, or other charges or regulations for the use of the commission. Schedules sent for filing must be addressed to Public Service Commission, PO Box 360, Jefferson City, MO 65102.

(29) All schedules filed with the commission shall be accompanied by a letter of transmittal which shall be prepared consistent with the format designated by the commission. If filing a paper copy and a paper receipt is desired, a duplicate copy should be submitted for return.

**Title 4—DEPARTMENT OF ECONOMIC
DEVELOPMENT
Division 240—Public Service Commission
Chapter 40—Gas Utilities and Gas Safety Standards**

ORDER OF RULEMAKING

By the authority vested in the Public Service Commission under section 386.250, RSMo 2016, the commission adopts a rule as follows:

4 CSR 240-40.085 is adopted.

A notice of proposed rulemaking containing the text of the proposed rule was published in the *Missouri Register* on January 2, 2019 (44 MoReg 72-73). Those sections with changes are reprinted here. This proposed rule becomes effective thirty (30) days after publication in the *Code of State Regulations*.

SUMMARY OF COMMENTS: The public comment period ended February 1, 2019, and the commission held a public hearing on the proposed rule on February 6, 2019. The commission received timely written comments from the staff of the commission, the Office of the Public Counsel, and Union Electric Company d/b/a Ameren Missouri. Jamie Myers offered comments on behalf of the commission's staff; Ryan Smith, representing the Office of the Public Counsel, and Paula Johnson, representing Union Electric Company d/b/a Ameren Missouri appeared at the hearing and offered comments.

COMMENT #1: For section (2), Ameren Missouri states that title pages are not particularly relevant when reviewing rate schedules in electronic form. Likewise, Ameren Missouri believes loose-leaf and Form No. 14 references are antiquated and should be deleted. The staff of the commission believes a title page is still necessary, but agrees with Ameren Missouri that references to loose leaf and Form No. 14 are no longer needed. OPC does not oppose Ameren Missouri's request that tariffs can be available in electronic instead of paper form.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees that electronic versions of tariffs are permissible instead of paper copies. However, the commission will continue to require title pages to tariffs. Thus, the commission amends section (2) to remove the references to loose leaf and Form No. 14.

COMMENT #2: For section (3), the staff of the commission would delete the phrase "in duplicate if receipt is desired" from the rule. Staff believes this language is extraneous, and staff wishes to attempt to make the rule more consistent with proposed rule 4 CSR 240-20.105(29). No party objects to staff's requested deletion.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees, and will delete the language that its staff requested to be deleted. The commission will amend section (3) to conform to the language in a similar commission rule that regulates electric utilities, which is 4 CSR 240-20.105(29).

COMMENT #3: For section (4), Union Electric Company d/b/a Ameren Missouri states that its headquarters are only accessible by approved badge access or by monitored escort. It is impractical to have security personnel, who are not tasked with or trained in customer relations, to provide access to hard copies of these schedules

at their stations. Further, it is not practical to have an Ameren Missouri customer experience employee stationed at the entrance with security to field such inquiries. Ameren Missouri suggests that customers may call the company's customer experience representatives to request a copy of any proposed changes be provided via email or with a hard copy printout, as they prefer. As such, Ameren Missouri requests the commission delete the portion of this section that would require hard copies of tariffs to be constantly available. Instead, Ameren Missouri would agree to make tariffs available upon customers' requests. Neither the staff of the commission nor OPC objects to this change.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees, and will delete the language that Union Electric Company d/b/a Ameren Missouri requested to be deleted. The commission notes that no party has commented on the provision of 4 CSR 240-40.085(1), which the commission will not amend, that requires gas utilities to keep open for public inspection schedules showing all its rates and charges.

COMMENT #4: For section (6), Union Electric Company d/b/a Ameren Missouri states that this regulation anticipates the filing of schedules and supplements via mail rather than through the commission Electronic Filing Information System ("EFIS"). Ameren Missouri believes that all electrical corporations subject to the filing requirements of 4 CSR 240-20.105 currently use EFIS rather than paper filing. However, if this assumption is inaccurate, the company has no objection to retaining language that anticipates hard copy filing; Ameren Missouri simply wants to be clear that electronic-only filing is also acceptable. The staff of the commission prefers that the rule contemplate electronic, mailed, and in-person filing. Staff would delete a sentence that states no consideration will be given to telegraphic notices.

RESPONSE AND EXPLANATION OF CHANGE: The commission agrees with its staff, and will delete the language its staff requested to be deleted.

4 CSR 240-40.085 Filing Requirements for Gas Utility Rate Schedules

(2) Rate schedules shall be published on the gas corporation's website. All sheets, except the title page sheet, must show in the marginal space at the top of the page the name of the gas corporation issuing, the PSC number of schedule, and the number of the page. In the marginal space at the bottom of sheet should be shown the date of issue, the effective date, and the name, title, and address of the officer by whom the schedule is issued. All schedules shall bear a number with the prefix PSC Mo. _____. Schedules shall be numbered in consecutive order beginning with number 1 for each gas corporation. If a schedule or part of a schedule is cancelled, a new schedule or part thereof (sheet(s) if loose-leaf) will refer to the schedule canceled by its PSC number; thus: PSC Mo. No. ____ canceling PSC Mo. No. ____.

(3) All schedules filed with the commission shall be accompanied by a letter of transmittal which shall be prepared consistent with the format designated by the commission. If filing a paper copy and a paper receipt is desired, a duplicate copy should be submitted for return.

(4) All proposed changes in rates, charges, or rentals or in rules that affects rates, charges, or rentals filed with the commission shall be accompanied by a brief summary, approximately one hundred (100) words or less of the effect of the change on the company's customers. A copy of any proposed change and summary shall also be served on the public counsel and be available for public inspection and reproduction during regular office hours at the general business office of the utility.

(6) Except as is otherwise provided, no schedule or supplement will