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

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| In the Matter of the Revision of the | ) | |
| Rules Regarding Electric Utilities | ) | **Case No. EX-2018-0389** |

## STAFF'S COMMENTS

**COMES NOW** the Staff of the Missouri Public Service Commission and submits,

for the Commission's consideration, the attached comments.

Respectfully submitted.

**/s/ Travis J. Pringle**
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## CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served, either electronically or by First Class United States Mail, postage prepaid, upon all parties or their representatives according to the Service List maintained by the Commission's Data Center, on this 17th day of January, 2019.

**/s/ Travis J. Pringle**

**Case No. EX-2018-0389**

**Comments of the Staff of the Missouri Public Service Commission**

As part of its review of Commission rules in compliance with Executive Order 17-03, Staff recommended rescission of certain duplicative requirements in Chapter 3, and an amendment and promulgation of a new rule in Chapter 20 to consolidate the requirements. These changes are designed to streamline, simplify, and improve the user-friendliness of Commission rules.

Staff supports the proposed rescissions:

- 4 CSR 240-3.145 Filing Requirements for Electric Utility Rate Schedules
  - Streamline – moving to Chapter 20
- 4 CSR 240-3.185 Submission of Reports Pertaining to the Decommissioning of Electric Utility Plants
  - Duplicative – consolidating into proposed amendment 4 CSR 240-20.070


Staff supports the proposed amendment:

- 4 CSR 240-20.070 Decommissioning Trust Funds
  - Consolidation – adds reporting requirements from Chapter 3

Staff supports the proposed rule:

- 4 CSR 240-20.105 Filing Requirements for Electric Utility Rate Schedules
  - Streamline – moving filing requirements from Chapter 3