



Liberty Utilities

Case No. OO-2025-0233

Missouri Public Service Commission Data Request - 0112

Data Request Received: 2025-07-10

Response Date: 2025-08-04

Request No. 0112

Witness/Respondent: Joey Sparks

Submitted by: Matthew Lucas, matthew.lucas@psc.mo.gov

REQUEST:**FOR ALL MISSOURI UTILITIES:**

During the in-person SAP/Billing meeting with Staff in Joplin on June 12, 2025, Joseph Sparks claimed that the existing statutes and rules allows the use of estimated interval reads for billing time-of-use electric customers. Please provide the specific statute or rule and the rationale that forms the basis of that opinion.

RESPONSE:

The Company apologizes for any confusion on this issue from the June 12, 2025, meeting. The Company recognizes that the existing statutes and rules, which were promulgated before the technological advancement of AMI meters and before default time-of-use rates were deployed by the Company, do not specifically address interval reads. Rather, the rules contemplate “beginning and ending meter readings of the billing period” used for billing and “billing period” defined as “a normal usage period of not less than twenty-six (26) nor more than thirty-five (35) days for a monthly billed customer nor more than one hundred (100) days for a quarterly billed customer, except for initial, corrected, or final bills.” 20 CSR 4240-13.020(9)(A) and 20 CSR 4240-13.015(1)(C).

For time-of-use rate billing, intervals are summed across the subject time-of-use period. If less than 3% of intervals are missing, which would be within the electric meter accuracy testing threshold described in 20 CSR 4240-10.030(27), then missing intervals are filled in based on the surrounding intervals. Please refer to the Company’s response to MPSC 0046 filed within this docket for the current calculation used for estimating AMI meters. Additionally, refer to the Company’s response to MPSC 0046.2