

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

In the Matter of the Proposed)	
Commission Rule 20 CSR 4240-10.035)	<u>File No. OX-2026-0045</u>
Residential Advanced Meter or Hub)	
Meter Opt-Out)	

STAFF COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and states as follows:

1. Staff supports the proposed amendments to 20 CSR 4240-10.035, published in the Missouri Register dated August 28, 2025. This proposed rule will establish commercially reasonable rules governing an opt-out process for residential electric, gas, water, and sewer customers that would like to use a traditional meter in lieu of using an advanced meter or hub meter.

2. This proposed rule is necessary as a result of the passage of Senate Bill No. 4 (truly agreed to and finally passed on March 13, 2025 and signed by Governor Kehoe on April 9, 2025), which added Section 386.820, RSMo. Subdivision (1) of subsection 2 of Section 386.820, RSMo, requires that the Commission shall promulgate commercially reasonable rules governing an opt-out process using an advanced meter or hub meter for customers no later than June 30, 2026.

3. This proposed rule governs the opt-out process from using an advanced meter or hub meter. This proposed rule requires the utilities to have a tariff that governs its advanced metering opt-out process, including limits on fees which may be charged by the utilities relating to the advanced metering opt-out process.

4. The proposed rule includes benefits for both customers and utilities. Customers that wish to have an advanced meter or hub meter to be removed and replaced with a traditional meter will be able to do so, and utilities will be able to charge fees associated with providing a traditional meter in lieu of an advanced meter or hub meter, up to the limits set by Section 386.820, RSMo.

WHEREFORE, Staff respectfully submits these comments for the Commission's consideration and supports the proposed rule of 20 CSR 4240-10.035.

Respectfully submitted,

/s/ J. Scott Stacey

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**ATTORNEY FOR STAFF OF THE
PUBLIC SERVICE COMMISSION**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 5th day of November, 2025.

/s/ J. Scott Stacey