

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

In the Matter of the Proposed	)	
Amendment of the Commission's Rule	)	<u>File No. OX-2026-0046</u>
20 CSR 4240-10.165 Relating to	)	
Prohibition on HVAC Services	)	

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 4240-10.165, published in the Missouri Register dated August 28, 2025. The proposed amendment prescribes the requirements and prohibitions for HVAC services respecting affiliated entities and regulated electrical corporations, gas corporations, and heating companies (covered utilities) when such covered utilities participate in affiliated transactions with an HVAC affiliated entity as set forth in sections 386.752, 386.754, 386.756, 386.760, 386.762 and 386.764, of the Revised Statutes of Missouri ("RSMo"), by the General Assembly of the State of Missouri..

2. The proposed amendment is necessary to update the standards, requirements, procedures, and prohibitions for whenever the utilities participate in transactions with affiliates, and 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 updated sections 386.752, 386.754, 386.760, RSMo.

WHEREFORE, Staff respectfully submits these comments for the Commission's consideration and supports the proposed amendment of 20 CSR 4240-10.165.

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 14th day of November, 2025.

/s/ J. Scott Stacey