

Exhibit No. 1

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November 25, 2025
Data Center
Missouri Public
Service Commission

Commission – Exhibit 1
Summary of Comments
Case No. OX-2026-0045

Stakeholder	Proposed Rule Reference	Change	Summary of Comment	Staff Response
Ameren Missouri	20 CSR 4240-10.035(3)(A)2a.	a. The utility may propose a single monthly fee for all customers using a traditional meter, or it may propose separate monthly fees for customers who elect to self-read the traditional meter and for those whose meters are read by the utility. In no event shall a utility assess more than one monthly fee per account for the use of a traditional meter.	The last sentence of the proposed rule differs slightly from the statute in that the statute requires the charge be tied to a traditional meter rather than the account. For electric and gas customers, the account will have two meters and it is not clear how the revenue would be allocated between the two accounts	Rather than completely striking the sentence, Staff recommends 20 CSR 4240-10.035(3)(A)2a. be modified as follows: a. The utility may propose a single monthly fee for all customers using a traditional meter, or it may propose separate monthly fees for customers who elect to self-read the traditional meter and for those whose meters are read by the utility. In no event shall a utility assess more than one monthly fee per <i>[account]</i> meter for the use of a traditional meter.
Ameren Missouri	20 CSR 4240-10.035(3)(A)3	Specific language not recommended	<ol style="list-style-type: none"> 1. Unclear on whether interest rate is applicable to unpaid amount due to inaccurate read/failed reporting or total bill. 2. Calculated one time or each month and whether compounded. 3. Difficult to determine the time period during which any underbilling occurred. 	<p>On point 1, The rule is clear that the interest rate is applicable “to the customer’s failure to report usage or reporting inaccurate information”</p> <p>On point 2, The rule states it occurs “in any given billing cycle.”</p> <p>Additionally, a utility proposing inclusion of such an interest rate will need to support its tariff</p>

				<p>application which may include additional clarity.</p> <p>On point 3, The rule does not require, rather it allows, a utility to include such an interest rate.</p>
Ameren Missouri	20 CSR 4240-10.035(4)	n/a	Supportive	n/a
Ameren Missouri	20 CSR 4240-10.035(5)(A)	(A) Each utility shall provide the customer with a detailed process to report meter readings by telephone or other commercially reasonable means. A utility may additionally offer reporting through a secure website, but will not be required to accept meter readings through the postal service.	<ol style="list-style-type: none"> 1. Difficult to read analog meters. 2. For customer self-reading to be effective, it has to occur at regular, very reliable intervals. Billing cycles cannot be held up because the utility receives a late meter reading. 3. Removal of postal service as a means for the provision of customer supplied meter reads. 	<p>Section (5) of the rule states “Customer-supplied readings shall be in accordance with 20 CSR 4240-13.020 <u>and the</u> utility’s commission approved tariffs”</p> <p>Chapter 13.020 addresses estimated reads and allows for postpaid, preaddressed postcards.</p> <p>Further, additional clarification may be proposed by the individual utilities specific to its circumstances when filing its proposed opt-out tariff (or updating in the case of Ameren Missouri).</p>
Ameren Missouri	20 CSR 4240-10.035(5) (B)	(B) If a customer elects to supply meter readings, the customer shall timely report accurate usage to the utility once per billing cycle. Meter readings provided outside of the time period	For customer self-reading to be effective, it has to occur at regular, very reliable intervals. Billing cycles cannot be held up because the utility receives a late meter reading.	<p>Section (5) of the rule states “Customer-supplied readings shall be in accordance with 20 CSR 4240-13.020 and the utility’s commission approved tariffs”</p> <p>Chapter 13.020 addresses when estimated reads may be obtained and requirements the utility must</p>

		<p>stated by the utility in order to stay within the billing cycle will result in an estimated bill.</p>		<p>follow when it renders a bill based on estimated usage.</p> <p>Additional clarification may be proposed by the individual utilities specific to its circumstances when filing its proposed opt-out tariff (or updating in the case of Ameren Missouri).</p> <p>Note Ameren Missouri, Spire Missouri, Evergy, and MAWC proposed different ways to address concerns with customer self-reading.</p>
<p>Evergy Missouri Metro, Evergy Missouri West, and Missouri American Water Company¹</p>	<p>20 CSR 4240-10.035(2)(C)</p>	<p>(C) Commercially available means a meter that is readily available for purchase by the utility from a utility approved vendor that meets the utility's specifications.</p> <p>Or</p> <p>(C) Commercially available means a meter from a supplier approved by the</p>	<p>Utilities have specifications for metering to make sure that the metering equipment works with the existing infrastructure, which varies by utility. Additionally, utilities have requirements related to managing the security of the equipment and the related supply chain.</p>	<p>The language proposed in section (4) states: "If a utility seeks to discontinue its advanced or hub meter opt-out process, it shall include information that is sufficient to determine traditional meters are not commercially available in its discontinuance filing."</p> <p>The proposed rule allows for the utilities to support its reasoning for discontinuing the option to opt-out of advanced meters.</p>

¹ MAWC comments indicate a change to Section (2)(B) however the comment recommends a change to definition of Commercially available found in Section (2)(C) of the published proposed rule.

		utility that is readily available for purchase by the utility.		
Evergy Missouri Metro and Evergy Missouri West	20 CSR 4240-10.035(2)(F)	(F) Inaccurate information means the intentional under-reporting of meter data in an effort to not pay for services. Inaccurate information does not mean minor differences in readings by less than two percent to account for variations based on the time of day that the meter is read and similar factors. There is a rebuttable presumption that there is intentional under-reporting of meter data when the difference between the self-reported readings and the Utility’s manual reading exceeds two percent.	For the statute and the rule to work efficiently and effectively an actionable threshold is needed. Evergy recommends that the Commission clarify this definition through the use of a rebuttable presumption phrase, which would dovetail the statutory requirements that address minor differences in readings with the use of the terms “intentional...in an effort to not pay for services” in an efficient and effective way.	The proposed rule is clear and does not need further defining measures to make the statute and rule work in tandem. Adding a rebuttable presumption also tends to shift the burden onto the customer, which is not a viable option.
Evergy Missouri Metro and	New subsection proposed	(5)(D) As part of the customer’s choice to self-read, such		Section (5) of the rule states “Customer-supplied readings shall be in accordance with 20 CSR

Evergy Missouri West		customer shall accept that obtaining a meter reading requires access and physical contact with the meter and will not inhibit the utility in executing a meter reading.		<p>4240-13.020 and the utility’s commission approved tariffs”</p> <p>Chapter 13.020 addresses when estimated reads may be obtained due to inability to access the customer’s premises (20 CSR 4240- 13.020(2)(A)3.). and provisions for discontinuance of service if a customer fails to grant access to the meter (20 CSR 4240-13.020(4)).</p> <p>Additional clarification may be proposed by the individual utilities when filing (or updating in the case of Evergy) its proposed opt-out tariff.</p>
Evergy Missouri Metro and Evergy Missouri West	New subsection proposed	(E) If the customer fails to report usage, inaccurately reports usage, or the utility does not receive the customer's service usage report on time, the utility may manually read the customer's meter or charge that customer based on an estimate of prior energy use in a manner approved	The proposed language in (E) is needed to provide clarity to both utilities and customers, in advance, on what happens when a customer is unable to timely or accurately self-report.	<p>Section (5) of the rule states “Customer-supplied readings shall be in accordance with 20 CSR 4240-13.020 and the utility’s commission approved tariffs”</p> <p>Chapter 13.020 addresses when estimated reads may be obtained and requirements the utility must follow when it renders a bill based on estimated usage.</p> <p>Additional clarification may be proposed by the individual utilities</p>

		by the commission. If the customer fails to report usage for their meter for two (2) consecutive months or any three (3) months in a rolling twelve-month period, the utility may resume monthly readings of the meter.		<p>when filing (or updating in the case of Evergy) its proposed opt-out tariff.</p> <p>Note Ameren Missouri, Spire Missouri, Evergy, and MAWC proposed different ways to address concerns with customer self-reading.</p>
Spire Missouri	New subsection proposed	(5)(D): If a customer elects to supply meter readings and, for two consecutive billing cycles, fails to supply accurate and timely meter reads, a utility may manually read such customer's meter each billing cycle.	While the statute provides that when a customer “fails to report usage, inaccurately reports usage, or the utility does not receive” reads on time, “the utility may manually read the customer’s meter,” 1 the Proposed Rule does not contain similar language.	<p>Section (5) of the proposed rule states “Customer-supplied readings shall be in accordance with 20 CSR 4240-13.020 and the utility’s commission approved tariffs”</p> <p>Subsection (5)(C) of the proposed rule states: “The utility shall obtain an actual meter reading to verify accuracy of customer-supplied meter readings at least once every twelve (12) months.”</p> <p>Chapter 13.020 addresses when estimated reads may be obtained and requirements the utility must follow when it renders a bill based on estimated usage.</p> <p>Additional clarification may be proposed by the individual utilities</p>

				<p>when filing (or updating in the case of Spire Missouri) its proposed opt-out tariff.</p> <p>Note Ameren Missouri, Spire Missouri, Evergy, and MAWC proposed different ways to address concerns with customer self-reading.</p>
Missouri American Water Company	20 CSR 4240-10.035(3)	Specific language not recommended	Include a proposed effective date (July 1, 2026) for the initial tariff required under this rule.	<p>386.820 RSMo allows for customers to opt out of advanced meter or hub meter commencing July 1, 2026.</p> <p>Staff does not oppose including the tariff effective date in the rule, however, the statute requires the same date so it is unnecessary.</p>
Missouri American Water Company	20 CSR 4240-10.035(5)(C)	(C) The utility shall obtain an actual meter reading to verify accuracy of customer-supplied meter readings at least once every twelve (12) months. The customer shall provide the Company physical access to the meter to obtain readings.	<p>General comment Section (5)(C) is duplicative of Chapter 13.</p> <p>Additional language proposed to address reading inside meters.</p>	<p>Staff agrees proposed section (5)(C) and 20 CSR 4240-13.020(4) both require the utility to obtain an actual meter read at least annually.</p> <p>Section (5) of the rule states “Customer-supplied readings shall be in accordance with 20 CSR 4240-13.020 and the utility’s commission approved tariffs”</p> <p>Chapter 13.020 addresses when estimated reads may be obtained due to inability to access the customer’s premises (20 CSR</p>

				<p>4240- 13.020(2)(A)3.). and provisions for discontinuance of service if a customer fails to grant access to the meter (20 CSR 4240-13.020(4)).</p> <p>Additional clarification may be proposed by the individual utilities when filing its proposed opt-out tariff.</p>
Missouri American Water Company	Remove 20 CSR 4240-10.035(8)(B)	<i>[(B) Number of advanced meters and hub meters in use by the utility to serve residential customers.]</i>	MAWC believes that such reporting goes beyond the statutory purpose, which is focused on customers who do not want advanced meters.	Staff recommends inclusion of Section (8)(B), along with the other reporting items in Section (8), as these items will assist the Commission and Staff in evaluating the cost and impact of the advanced meter opt-out rule.
Missouri American Water Company	New Section (9)	(9) (a) If the customer fails to report usage, inaccurately reports usage, or the utility does not receive the customer's service usage report once per billing cycle, the utility may manually read the customer's meter or charge that customer based on an estimate of prior energy use in a	MAWC proposes language to provide the utility with a path forward in the event a customer does not provide usage in a timely manner so that the utility may meet its obligations to bill according to the Commission's rules and regulations	<p>Additional clarification may be proposed by the individual utilities when filing its proposed opt-out tariff. MAWC's language may limit that flexibility.</p> <p>MAWC's language, as proposed, should not be adopted as it introduces terms not defined in the proposed rule and has an incorrect rule reference. (i.e. "customer's service usage report"; "AMI technology").</p>

		manner approved by the commission. If the customer fails to report usage for their meter for two (2) consecutive months or any three (3) months in a rolling twelve-month period, the utility may discontinue service pursuant to 4 CSR 4240-3.020 (4). (b) If the customer fails to report usage for their meter for two (2) consecutive months or any three (3) months in a rolling twelve-month period or the Company discontinues service three (3) times for this reason over the life of the account, then the Company may install AMI technology to obtain meter readings so that the utility can accurately bill the customers.		Note Ameren Missouri, Spire Missouri, Evergy, and MAWC proposed different ways to address concerns with customer self-reading.
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Ms. Peterson and Workman Home Improvements	20 CSR 4240- 10.035(2)(H)	Specific language not provided	Concern with traditional meter definition; suggests defining as analog meter	Staff notes that certain meters are available without a communication module but with a digital view.
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