

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

In the Matter of the Proposed  
Commission Rule 20 CSR 4240-10.195  
Appraisal Requirements for Acquisition  
Of a Small Water or Sewer Utility to be  
Used by a Large Water or Sewer Public  
Utility

**File No. WX-2026-0108**

### STAFF COMMENTS

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

1. Staff supports the proposed rule of 20 CSR 4240-10.195, published in the Missouri Register dated December 1, 2025. The proposed rule will establish reasonable rules governing an appraisal requirement for large water or sewer utilities for acquisition of small water or sewer utilities.

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 revised Section 393.320, RSMo. Subsection 9 of Section 393.320, RSMo, requires that the Commission shall promulgate rules to implement the provisions of Section 393.320, RSMo.

3. This proposed rule establishes terms and conditions governing how large water or sewer or combined water and sewer utilities conduct appraisal and acquisitions of small water or sewer or combined water and sewer utilities. The terms and conditions in the rule provide regulatory clarity in support of Section 393.320, RSMo, as well as ensuring evaluations and determinations provide necessary information regarding the health and safety of the utility.

**WHEREFORE**, Staff respectfully submits these comments for the Commission's consideration and supports the proposed rule of 20 CSR 4240-10.195.

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 30th day of December, 2025.

**/s/ J. Scott Stacey**