

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

In the Matter of the Proposed Rule 20 CSR)
4240-23.040 State Reliability Mechanism)
(SRM))

Case No. EX-2026-0171

RESPONSIVE COMMENTS OF THE OFFICE OF THE PUBLIC COUNSEL

The Office of the Public Counsel (the “OPC”) submits these Responsive Comments in response to the Responsive Comments filed by the Staff of the Public Service Commission of the State of Missouri (“Staff” and “Commission,” respectively), which the Commission entered as Hearing Exhibit 1.¹ (Doc. 14).

The OPC appreciates the Commission keeping open the hearing record to receive comments in response to Staff’s Responsive Comments. The OPC has reviewed Staff’s Responsive Comments and appreciates Staff’s consideration of and response to each parties’ comments. The OPC maintains its objection to the proposed definition of “transmission losses” for the reasons noted at the April 3, 2026 rulemaking hearing. The OPC has no further comments.

WHEREFORE, the OPC respectfully requests that the Commission consider these responsive comments, as well as the OPC’s initial comments.

Respectfully submitted,

/s/ Lindsay VanGerpen
Lindsay VanGerpen (#71213)
Senior Counsel
Missouri Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102
Telephone: (573) 751-5565
Facsimile: (573) 751-5562
E-mail: Lindsay.VanGerpen@opc.mo.gov

¹ On April 6, 2026, the Commission issued its Notice of Hearing Record Remaining Open for Additional Reply Comments memorializing its ruling from the rulemaking hearing that the hearing record would stay open through April 7, 2026, to receive responsive comments to Staff’s Responsive Comments. (Doc. 13).

CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this 7th day of April 2026.

/s/ Lindsay VanGerpen