

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

In the Matter of the Proposed	)	
Amendments and Proposed Rescission of	)	<u>File No. OX-2026-0334</u>
the Commission’s Rules Relating to	)	
Chapter 3 – Filing Requirements		

STAFF COMMENTS

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

1. Staff supports the proposed amendments to the Commission’s Chapter 3 – Filing Requirements rules, including:

- 20 CSR 4240-3.010 Definitions
- 20 CSR 4240-3.030 Minimum Filing Requirements for Utility Company General Rate Increase Requests
- 20 CSR 4240-3.100 Definitions Pertaining Specifically to Electric Utility Rules
- 20 CSR 4240-3.130 Filing Requirements and Schedule of Fees for Applications for Approval of Electric Service territorial Agreements and Petitions Designation of Electric Service Areas
- 20 CSR 4240-3.135 Filing Requirements and Schedule of Fees Applicable to Applications for Post-Annexations Assignment of Exclusive Service Territories and Determination of Compensation
- 20 CSR 4240-3.140 Filing Requirements for Applications for Authority for a Change of Electrical Suppliers
- 20 CSR 4240-3.150 Filing requirements for Electrical Utility Promotional Practices
- 20 CSR 4240-3.155 Requirements for Electric Utility Cogeneration Tariff Filings
- 20 CSR 4240-3.162 Electric Utility Environmental Cost Recovery Mechanisms Filing and Submission Requirements
- 20 CSR 4240-3.200 Definitions Pertaining Specifically to Gas Utility Rules

- 20 CSR 4240-3.205 Filing Requirements for gas Utility Applications for Certificates of Convenience and Necessity
- 20 CSR 4240-3.230 Filing Requirements for Gas Storage Companies Requesting the Authority to Acquire Property Through Eminent Domain Proceedings
- 20 CSR 4240-3.255 Filing Requirements for Gas Utility Promotional Practices
- 20 CSR 4240-3.300 Definitions Pertaining Specifically to Sewer Utility Rules
- 20 CSR 4240-3.400 Filing Requirements for Steam Heating Utility Applications for Certificates of Convenience and Necessity
- 20 CSR 4240-3.625 Filing Requirements for Applications for Approval of Water Service Territorial Agreements.

2. Staff also supports the proposed rescission to the Commission’s Chapter 3 – Filing Requirements rules, including:

- 20 CSR 4240-3.156 Electric Utility Renewable Energy Standard Filing Requirements

3. These amendments were published in the Missouri Register dated July 1, 2026. The majority of the proposed amendments are to update rules and statutory citations identified as needing correction during the Commission’s periodic rule review. Some additions were also made for clarification purposes. The 20 CSR 4240-3.156 rule is being rescinded as the filing requirements are now set out in 20 CSR 4240-20.100.

4. The proposed amendments are essential to the health, safety, and welfare of Missouri residents by ensuring that the Commission, stakeholders, consumers, etc. have the correct citations and locations of commission rules.

WHEREFORE, Staff respectfully submits these comments for the Commission’s consideration and supports the proposed amendments and rescission of the Commission’s Chapter 3 Filing requirements rules mentioned above in Paragraph One and Two.

Respectfully submitted,

/s/ J. Scott Stacey

J. Scott Stacey

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Missouri Public Service Commission

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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 31st day of July, 2026.

/s/ J. Scott Stacey