

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

In the Matter of the Proposed	)	
Amendments of the Commission's Rules	)	<u>File No. TX-2026-0353</u>
Relating to Communications in Chapters	)	
28, 29, 31, 34, and 36 of 20 CSR 4240	)	

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 4 – Standards of Conduct rules, including:

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| • 20 CSR 4240-28.012 | Annual Reports, Statements of Revenue, and Assessments; |
| • 20 CSR 4240-28.014 | Network Configuration; |
| • 20 CSR 4240-29.010 | The LEC-to-LEC Network; |
| • 20 CSR 4240-29.020 | Definitions; |
| • 20 CSR 4240-29.030 | General Provisions; |
| • 20 CSR 4240-29.100 | Objections to Payment Invoices; |
| • 20 CSR 4240-31.013 | ETC Application Requirements; |
| • 20 CSR 4240-34.020 | Definitions; |
| • 20 CSR 4240-34.090 | Database Accuracy Standards; |
| • 20 CSR 4240-36.020 | Filing Procedures; |
| • 20 CSR 4240-36.030 | Mediation; |
| • 20 CSR 4240-36.040 | Arbitration; and |
| • 20 CSR 4240-36.050 | Commission Approval of Agreements Reached by Arbitration. |

2. These amendments were published in the Missouri Register dated July 15, 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.

3. 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 of the Commission's Chapter 4 Standards of Conduct rules mentioned above in Paragraph One.

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 12th day of August, 2026.

/s/ J. Scott Stacey