

Stakeholder	Proposed Rule(s) Being Amended	Summary of Comment	Response
Staff of the Commission	20 CSR 4240-4.010 20 CSR 4240-4.015 20 CSR 4240-4.017 20 CSR 4240-4.040	Staff field comments in support of the proposed amendments. Staff explained that the majority of the proposed amendments are to update rules and statutory citations identified as needing correction during the Commission’s periodic rule review. Staff also stated that some additions were made for clarification purposes.	The Commission thanks Staff for its comment.
Union Electric Company d/b/a Ameren Missouri	20 CSR 4240-4.015	Ameren Missouri generally supported the amendments but also proposed further amendment to the definition of “Commission Staff” and the “Office of the Commission” to clarify the roles of the technical advisory staff and the consumer services staff in 4.015. Specifically, Ameren Missouri suggests that because the definition of “Commission staff” is being revised, the definition of "Office of the Commission" should also be revised, so that the two definitions are consistent. Ameren proposes that the definition of "Office of the Commission" at section 4.015(10) be amended as follows (proposed new language in bold): Commissioners, a commissioner, a member of the commission’s technical	The Commission thanks Ameren Missouri for its comments. As noted in Ameren Missouri’s comments, the Commission has another pending rulemaking regarding 20 CSR 240-3 (Chapter 3) in Case No. OX-2026-0334. In that case, Evergy had commented regarding adding the word “independent” before technical advisory staff in 20 CSR 4240-3.010(4); however, Staff responded that it did not support the recommended edit, as the intent was to exclude the Commission’s technical advisory staff from rules requiring action by staff. The Commission agrees with staff regarding the intent of the amendment and to remain consistent with the Chapter 3

		advisory staff, personal advisors, or the commission's regulatory law judges. Ameren Missouri also suggests that a definition of "technical advisory staff" be added to 4.015 to clarify that "technical advisory staff" within the definitions of "Commission staff" and "Office of the Commission" includes both the technical advisory staff authorized by Section 386.135.1, RSMo, and the Bulk Regional Transmission Unit employees, if that is the Commission's intent. Lastly, Ameren Missouri commented that the proposed definition of "Commission staff" for Chapter 4 includes the "administrative division" within the exclusionary group and that the administrative division includes the Consumer Services employees who handle informal complaints (and informal complaints may lead to formal complaints or otherwise be at issue in a case). As such, Ameren Missouri suggests that the proposed definition for "Commission staff" at section 4.015(4) be amended as follows (proposed new language in bold): Commission staff—All personnel employed by the commission whether on a permanent or contractual basis who are not members of the general counsel division,	rulemaking, the Commission will not make the addition. Minor organizational changes have been taking place recently at the Commission and the online phone lists and organizational charts will be amended accordingly to reflect the changes and to clarify who stakeholders make contact regarding substantive issues with regard to the Chapter 4 rules. With regard to adding the exclusion of the Consumer Services employees from the definition of Commission Staff, the Commission's Consumer Services employees are not part of Commission Staff under this definition. Making this proposed change would include them as part of Commission Staff, which is incorrect. Thus, the Commission will not make this change.
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Evergy Missouri Metro and Evergy Missouri West (collectively, “Evergy”)	20 CSR 4240-4.015(4)	Evergy also generally supported the Chapter 4 amendments but also suggested that with regard to the change of the definition of “Commission Staff” in 20 CSR 4240-4.015(4), that the Commission further clarify for purposes of the <i>ex parte</i> rule, who it is appropriate for stakeholders to interact with in the Bulk Regional Transmission Unit and how they may interact with those persons.	The Commission thanks Evergy for its comments. Minor organizational changes have been taking place recently at the Commission and the online phone lists and organizational charts will be amended accordingly to reflect the changes and to clarify who stakeholders make contact regarding substantive issues with regard to the Chapter 4 rules.
Evergy	20 CSR 4240-4.017(1)	Evergy also raised one point for discussion regarding the look-back period for communications in the 60-day notice in 20 CSR 4240-4.017(1), even though the 90-day look-back period is not currently being amended. Evergy proposes the Commission consider changing the time that communications of substantive issues must be reported when filing its 60-day notice from 90 days prior to the notice to 30 days prior to the notice. Evergy stated this is more in-line with the requirements of neighboring states, including Nebraska, Iowa, Arkansas, and Kansas, which do	Because the notice periods contained in 4.017 were not included in the proposed amendments published as part of this rulemaking, the Commission does not find it appropriate to make such a substantive change in this rulemaking. However, the Commission appreciates Evergy’s suggestion to bring Missouri’s rules more in-line with its neighboring states and will certainly take that into consideration for future rulemakings.

		not have as long or as strict of reporting requirements as Missouri.	
Missouri-American Water Company	20 CSR 4240-4.010 20 CSR 4240-4.015 20 CSR 4240-4.017 20 CSR 4240-4.040	Missouri-American’s comments were in support of the proposed amendments.	The Commission thanks Missouri-American for its comments.