BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Proposed Amendments of the Commission's Rules Relating to Electric Utilities in Chapters 20, 22, and 23 of 20 CSR 4240	)))	**File No. EX-2027-0060**

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 Rules relating to Electric Utilities in Chapter 20, 22, and 23 of 20 CSR 4240, including:

- 20 CSR 4240-20.030 Uniform System of Accounts—Electrical Corporations;
- 20 CSR 4240-20.045 Electric Utility Applications for Certificates of Convenience and Necessity;
- 20 CSR 4240-20.050 Individual Electric Meters—When Required;
- 20 CSR 4240-20.060 Cogeneration;
- 20 CSR 4240-20.065 Net Metering;
- 20 CSR 4240-20.070 Decommissioning Trust Funds;
- 20 CSR 4240-20.090 Fuel and Purchased Power Rate Adjustment Mechanisms;
- 20 CSR 4240-20.091 Electric Utility Environmental Cost Recovery Mechanisms;
- 20 CSR 4240-20.092 Definitions for Demand-Side Programs and Demand Side Programs Investment Mechanisms;
- 20 CSR 4240-20.093 Demand-Side Programs Investment Mechanisms;
- 20 CSR 4240-20.094 Demand-Side Programs;
- 20 CSR 4240-22.020 Definitions;
- 20 CSR 4240-22.030 Load Analysis and Load Forecasting;
- 20 CSR 4240-22.040 Supply-Side Resource Analysis;
- 20 CSR 4240-22.045 Transmission and Distribution Analysis;
- 20 CSR 4240-22.050 Demand-Side Resource Analysis;
- 20 CSR 4240-22.060 Integrated Resource Plan and Risk Analysis;
- 20 CSR 4240-22.070 Resource Acquisition Strategy Selection;

- 20 CSR 4240-22.080 Filing Schedule, Filing Requirements, and Stakeholder Process;
- 20 CSR 4240-23.010 Electric Utility System Reliability Monitoring and Reporting Submission Requirements;
- 20 CSR 4240-23.020 Electrical Corporation Infrastructure Standards; and
- 20 CSR 4240-23.030 Electrical Corporation Vegetation Management Standards and Reporting Requirements.

2. These amendments were published in the Missouri Register dated October 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 and to update standards and codes.

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 Rules in Chapters 20, 22, and 23 of 20 CSR 4240 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 2nd day of November, 2026.

/s/ J. Scott Stacey