

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

In the Matter of the Revision of the)	
Commission's Rules Regarding Electric)	File No. EX-2018-0389
Utilities)	

PUBLIC COUNSEL'S COMMENTS ON PROPOSED RULES

COMES NOW, the Office of the Public Counsel (OPC) to provide comments on proposed Public Service Commission (Commission) rule changes. The OPC requests that the Commission consider the comments and recommendations provided as follows:

1. The Commission proposed repealing two existing rules within Commission Rule Chapter 3 regarding general filing requirements, and moving their operative language to Chapter 20 regarding electrical corporations.

2. In the newly revised 4 CSR 240-20.105, the Commission employs the verb "generating" in section (1) where the noun "generation" would be more appropriate. The OPC suggests that the Commission change the phrasing accordingly.

3. The Commission's newly created section (22) of 4 CSR 240-20.105 refers to municipalities being responsible for the filing of schedules of rates and supplements. Although this reference is a reprint of existing regulatory language, and may exist due to the Commission's limited jurisdiction over municipally owned electric suppliers, it is unclear why only section (22) contains "municipality" language when no other section specifying filing requirements does. Therefore, the OPC believes this to be a typographical error, and suggests that the phrase "or municipality" be removed from section (22). If instead this "municipality" language is purposeful, the OPC suggest that revisions to other sections are necessary to make clear what municipalities must file before the Commission.

WHEREFORE, the OPC requests that the Commission incorporate the comments and recommendations provided herein.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

/s/ Caleb Hall

Caleb Hall, #68112

200 Madison Street, Suite 650

Jefferson City, MO 65102

P: (573) 751-4857

F: (573) 751-5562

Caleb.hall@ded.mo.gov

**Attorney for the Office of the Public
Counsel**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 17th day of January, 2019, with notice of the same being sent to all counsel of record.

/s/ Caleb Hall