

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

In the Matter of the Tariff Filing by Mo-)	
Kan Dial Company, Inc., to Establish a)	Case No. IT-2009-0368
15-day Due Date for Bills.)	Tariff File No. JI-2009-0656

STAFF’S RESPONSE TO SUGGESTIONS IN OPPOSITION TO MOTION TO SUSPEND

COMES NOW the Staff of the Missouri Public Service Commission and for its response states:

1. On March 16, 2009, Mo-Kan Dial Company, Inc., submitted a revised tariff sheet designed to reduce the due date for a subscriber’s bill from 21 days after the bill is rendered to 15 days after the bill is rendered. Mo-Kan has a waiver of the Commission rule, 4 CSR 240-33-040(5), that establishes a 21-day due date for residential customers’ bills.

2. On April 8, 2009, the Staff filed a motion requesting the Commission to suspend and set the tariff submission for hearing. In the Staff’s opinion, Mo-Kan’s proposal to reduce the due date for a subscriber’s bill to 15 days after the bill is rendered is not just and reasonable.

3. On April 13, 2009, Mo-Kan filed its suggestions in opposition to the Staff’s motion. In general, Mo-Kan alleges that some other entities utilize due dates around 15 days.

4. The allegations in Mo-Kan’s suggestions should be addressed through the hearing process. For example, Mo-Kan confuses the City of Kansas City with KCPL. Mo-Kan alleges that “the city of Kansas City (KCPL)” appears to utilize a due date of 15 days or less. KCPL’s tariff, P.S.C. MO. No. 2, Revised Sheet No. 1.26, which is on file with the Commission, provides that any unpaid bill for service under a Residence Service rate schedule shall become delinquent on the twenty-second day after rendition. Further, it is not clear from Mo-Kan’s suggestions whether the other entities’ due dates are for residential service or for business service.

WHEREFORE, the Staff requests the Commission to suspend, and set for hearing, Mo-Kan's tariff submission in File No. JI-2009-0656.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all parties listed below this 13th day of April, 2009.

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