

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

In the Matter of Proposed Revisions)
To Improve the Commission’s Rules) File No. AX-2018-0395

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 recommendation provided as follows:

1. The Commission proposed various changes to its rules regarding procedures before the Commission, filing requirements, and service standards upheld by all utilities. Most of those changes clarify existing practice, consolidate rule language, and make other technical changes.

2. The OPC first notes that the Commission’s proposed change to 4 CSR 240-3.010 can be improved. The Commission’s amendment correctly updates a reference to a subdivision of Section 386.020, RSMo, corresponding to the statutory definition of “water corporation.” However, this update can be achieved simply by referencing Section 386.020 alone without the specific subdivision, and citing to Section 386.020 itself relieves the Commission of having to amend 4 CSR 240-3.010 if more definitions are later added to Section 386.020 by Missouri’s General Assembly. Therefore, the OPC suggest that the Commission alter its amendment as follows:

“(32) Water utility means a water corporation as defined in section 386.020[(58)], RSMo.”

3. The OPC secondly suggests that 4 CSR 240-13.055(15)(C)1.C may contain a spelling error because it reads “Other serves known to the utilities.” The OPC believes the Commission intends it to read, “Other *services* known to the utilities.”

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

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

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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 18th day of January, 2019, with notice of the same being sent to all counsel of record.

/s/ Caleb Hall