

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

In the Matter of the Consideration of Adoption of the)
PURPA Section 111(d)(14) Time-Based Metering and)
Communications Standard as Required by Section)
1251 of the Energy Policy Act of 2005.)

Case No. EO-2006-0496

RESPONSE TO QUESTIONS BY AARP

COMES NOW the AARP, by and through counsel, in response to the Public Service Commission's (Commission's) August 17, 2006 Order Directing Filing, and hereby submits its answers to the following questions:

a) Can this case be closed based on "prior state actions" as provided in Section 1251(b)(3) of the Act [16 U.S.C. 2622(d)], and why or why not?

AARP is not aware of any prior Missouri state actions that address time-based metering and communications standards which would impact the Commission's ability to address the issues in this docketed case.

b) Can this case be consolidated with any, some or all of the following cases—EO-2006-0493, EO-2006-0494, EO-2006-0495 and EO-2006-0497—because the issues addressed in one or more of these cases are similar, and why or why not?

AARP takes no position either for or against consolidation. However, AARP has only intervened in Case No. EO-2006-0496 and only wishes to participate with regard to the issues in that case.

c) What type of proceeding (e.g., rulemaking, rate case implementation, etc.) should the Commission use to address the issues in this case in order to meet the Public Utility Regulatory Policies Act of 1978 ("PURPA") Section 111(a) and 111(b) "consideration and determination" requirements [16 U.S.C. 2621(a), 2621(b)], and why?

AARP recommends that the Commission proceed forward in this case to determine if any consensus can be reached on the issues to this case, and to determine if any potentially contested issues can be delineated. Based on the outcome of this case, the Commission should consider whether or not to propose a rule to set uniform standards for all regulated utilities.

Respectfully submitted,

/s/ John B. Coffman

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties of record on this 15th day of September 2006:

/s/ John B. Coffman
