

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

In the Matter of a Working Case to)
Address Security Practices for Protecting) File No. AW-2015-0206
Essential Utility Infrastructure)

**ADDITIONAL RESPONSE OF THE MISSOURI CABLE
TELECOMMUNICATIONS ASSOCIATION**

MCTA respectfully requests that the Missouri Public Service Commission take no action in AW-2015-0206 today. In support of its Request, MCTA states:

1. On March 4, 2015, this Commission issued its “Order Opening a Working Case to Address Security Practices for Protecting Essential Utility Infrastructure.” The Order was served on electric, natural gas, sewer and water utilities. Those utilities were invited to a workshop on March 23, 2015.

2. At the workshop, the presentation suggested that “Electric utilities, Natural Gas utilities, Water/Sewer utilities.” would be “requested/required to report information related to cybersecurity/physical infrastructure threats[.]”

3. Since that time, Staff has requested that the Commission also include CLECs and ILECs in the group that would be required to report information, and, contrary to the Commission’s previous directives, that the information be provided in writing.

4. Staff filed its Amended Request for Commission Order on July 17, 2015.

5. None of the pleadings in File No. AW-2015-0206 were served on MCTA or MCTA’s counsel.

6. MCTA filed a Response on July 31, 2015 in this docket detailing the concerns of MCTA members.

7. On information and belief, the Staff met with some members of the telecommunications industry on August 3, 2015 regarding the proposed order. MCTA was not allowed to participate in such meeting.

8. On information and belief, based on the August 3, 2015 meeting the Staff has (at least informally) made a seconded amended request for Commission Order.

9. MCTA has not had an opportunity to review or comment on the seconded amended request and desires to do so.

10. To the extent the proposed Order mandates telecommunications companies to respond to questions about security practices, MCTA renews its objections in its initial response.

WHEREFORE, MCTA respectfully requests that the Commission take no action in AW-2015-0206 today.

Respectfully submitted,

BLITZ, BARDGETT & DEUTSCH, L.C.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by email this 5th day of August, 2015, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Stephanie S. Bell