

**Holsman, Laura**

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**From:** Sundermeyer, Susan  
**Sent:** Wednesday, December 23, 2009 1:08 PM  
**To:** Holsman, Laura  
**Subject:** FW: Draft of 4 CSR 240-22 Rule Revisions - And Request for Comments  
**Attachments:** Comments and Examples Load Analysis and Forecasting Rule.pdf

[Will you file this please?](#)

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**From:** Rogers, John  
**Sent:** Wednesday, December 23, 2009 8:19 AM  
**To:** Sundermeyer, Susan  
**Subject:** FW: Draft of 4 CSR 240-22 Rule Revisions - And Request for Comments

Susan:

Please file this email and attachment in EW-2009-0412.

Thanks,

John

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**From:** Todd Tarter [mailto:TTarter@empiredistrict.com]  
**Sent:** Tuesday, December 22, 2009 4:56 PM  
**To:** Rogers, John  
**Cc:** Aaron Doll; Scott Keith  
**Subject:** RE: Draft of 4 CSR 240-22 Rule Revisions - And Request for Comments

Dec-22-09

John,

Attached are comments from Empire related to the load analysis and forecasting section. It contains examples of what is perceived to be (1) a lack of flexibility in the forecasting rule and (2) additional non-essential side-analyses in the forecasting rule.

Respectfully submitted,

Todd Tarter

The Empire District Electric Company

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**Subject:** Draft of 4 CSR 240-22 Rule Revisions - And Request for Comments  
**Importance:** High

Attached is a clean copy of the latest draft of 4 CSR 240-22, a red-line version of the latest draft changes to the current 4 CSR 240-22, and a redline version of the latest draft changes to Staff draft v2 circulated prior to the Chapter 22 Rulemaking Workshop 4.

Please send any suggested edits and comments to me not later than December 28, 2009, and I will file your comments in EW-2009-0412, or you may file your suggested edits and comments in EW-2009-0412 yourself.

Staff will consider all suggested edits and comments received by December 28, 2009 during its preparation of an additional draft, if necessary, for distribution to you in early January 2010.

The on-the-record meeting for presentations before the Commission on the 4 CSR 240-22 Rule Revisions is scheduled for January 25, 2010 beginning at 8:30 AM in Room 310. This on-the-record meeting will be webcast.

12/23/2009

Finally, I am including a worksheet which contains the analysis prepared by Staff to select the date for triennial compliance filings and annual update filings (see revised draft 4 CSR240-22.080(1)). When considering the interests of the utilities, Staff and stakeholders, Staff believes that April 1 is the best date for triennial compliance filings and annual update filings.

Staff appreciates your interest in and support of the Chapter 22 rulemaking process.

John Rogers  
Utility Regulatory Manager  
Missouri Public Service Commission  
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Fax: 573-751-1847

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