

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

In the Matter of a Repository File)	
Concerning Staff's Review of the)	Case No. EW-2011-0139
Commission's Fuel Adjustment)	
Clause Rules)	

Reply Comments of MIEC

MIEC hereby provides its reply comments in accordance with the September 29, 2015 email from Staff representative Natelle Dietrich.

MIEC generally endorses the comments offered by the Office of Public Counsel ("OPC") because they support MIEC's objectives of maintaining or improving transparency and accountability. In particular, MIEC would highlight the importance of 4 CSR 240-20.090(5) and corresponding 3.161(5) pertaining to the filing of monthly and accumulation period information. OPC appropriately retains a number of items of information that the straw draft prepared by Staff would omit. OPC also recommends retaining the identity of monthly data, rather than allowing data for each accumulation period to be filed for the entire period without monthly distinction. MIEC believes it is important to retain the requirement to supply all of the data currently required by these rules, and to provide the data with monthly granularity.

In addition, MIEC strongly recommends that utilities continue to be required to submit the monthly data on a monthly basis and not delay submitting monthly data until the end of an accumulation period. Availability of monthly data, submitted for each month when the data for the month becomes available, is important to those business customers who are particularly sensitive to changes in the level of the FAC. Receiving the data on a monthly basis provides additional visibility, enhances the customer's ability to project the level of future FACs, and

allows for more effective budgeting and cost management. Although having this information on this time schedule may not be needed for regulatory purposes, it is extremely valuable for any customer needing to make projections to have the data on a timely basis (with no more of a delay than currently is built into the reporting system).

Respectfully submitted,

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