

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

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

Comments of MIEC

Missouri Industrial Energy Consumers (“MIEC”)¹ has participated in the workshops conducted by the Staff of the Missouri Public Service Commission (“Staff”) and appreciates the continued opportunity to supply comments.

These comments are submitted in specific response to the September 29, 2015 e-mail from Staff representative Natelle Dietrich that offered the opportunity to submit comments on suggested rule language by October 20, 2015.

4 CSR 240-20.090(6) – Surveillance Monitoring Reports

Under current rules, whenever a utility has in place a revenue adjustment mechanism (“RAM”) it is obligated to file periodic quarterly and annual surveillance monitoring reports. Timely access to the information in these reports is critical to the monitoring of utility performance.

Utilities have proposed that the requirement for monitoring reports be moved to Chapter 3. MIEC likely has no objection to moving the reporting requirement to a different chapter. However, the removal of this requirement from its current location should be simultaneous to the addition of this requirement in Chapter 3. In fact, any proposal to remove the requirement from the FAC rules prior to having completed the establishment of these

¹MIEC participants include many of the largest consumers of electricity in Missouri. Because of the significant quantity of electricity purchased by these companies, and the fact that fuel cost is an above-average percentage of their cost of service, appropriate treatment of fuel cost recovery is very important to MIEC.

requirements in another location would create a gap in reporting information, which would not be appropriate.

Other Portions of the Rule

Rather than commenting specifically on other language changes, MIEC states in general that it supports any language (whether existing or proposed) that increases, or at least maintains, transparency and that increases, or at least maintains, accountability by the utilities for their actions and their monetary and other requests.

Respectfully submitted,

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