

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

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| In The Matter Of A Repository File Concerning |) | |
| Staff's Review Of The Commission's Fuel |) | Case No. EW-2011-0139 |
| Adjustment Clause Rules. |) | |

THE OFFICE OF THE PUBLIC COUNSEL'S RESPONSE

COMES NOW the Office of the Public Counsel (Public Counsel) and for its Response states as follows:

1. In November 2010, the Missouri Public Service Commission (Commission) opened this working case to facilitate the Missouri Public Service Commission Staff (Staff) review of the Commission's rules regarding fuel adjustment clauses.
2. On December 16, 2014, Union Electric Company d/b/a Ameren Missouri, Kansas City Power & Light Company, KCP&L Greater Missouri Operations Company, and The Empire District Electric Company (collectively the Electrical Corporations) jointly filed a proposal asking the Commission to establish a timeline for completion of Staff's review of those rules and to allow time for stakeholders to respond to Staff's proposals.
3. In the joint filing, the Electrical Corporations propose:
 - a. Stakeholders to provide written feedback to Staff on Staff's proposed changes by January 23, 2015.
 - b. Workshops to be held in March, May, and July 2015, with Staff and any other stakeholder desiring to do so to make a recommendation to the Commission by August 15, 2015, regarding whether additional workshops are warranted. If further workshops are not scheduled after August 15, 2015, Staff to provide a recommendation regarding changes to the FAC rules by September 15, 2015.

The Electrical Corporations also state:

12. This entire process would occur over a period of just over nine months, which is reasonable considering the time that has been taken thus far to develop the very significant changes that the Staff has proposed to stakeholders and as compared to other workshop processes involving much shorter and less complex rules.

4. On December 17, 2014, the Commission issued an Order requiring any stakeholder wishing to respond to the Joint Proposal of the Electrical Corporations for Completing the Commission's Review of the Fuel Adjustment Clause Rules to do so no later than December 23, 2014.

5. Public Counsel now states that it does not oppose the Joint Proposal of the Electrical Corporations.

WHEREFORE, Public Counsel respectfully submits its Response.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

/s/ Christina L. Baker

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the parties of record this 22nd day of December 2014.

Missouri Public Service Commission

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