

FILED
JAN 8, 2026
Missouri Public
Service Commission

Exhibit No. 3

MAWC – Exhibit 3
MAWC Comments
Case No. WX-2026-0108

Summary of MAWC's Position on Proposed Rule Revisions

MAWC urges the Commission to establish a process and timeline to appoint an appraiser

MAWC is generally agreeable with OPC's proposed language, but proposed some clarifying language to the timing of the Commission's appointment of appraiser. MAWC disagrees with Staff's recommendation that a process is not required.

MAWC believes defined terms for creditor and material interest are imperative

- MAWC believes it is important to define these terms to avoid ambiguity and ensure it is clear when an appraiser is disqualified from a project.
- OPC's and Staff's proposed addition that the appraiser shall not be "associated with" the utility creates ambiguity and uncertainty.

MAWC agrees with OPC's proposed reference to Missouri law and USPAP standards

MAWC disagrees with Staff that a specific version number should be referenced as it would outdate the regulation. Most professional standards are updated regularly; there is no need to limit or restrict the application of those standards.

MAWC agrees with OPC's and Staff's proposed application statement whether any corrected reports were received and a description of all changes made in the corrected report

MAWC opposes the proposed revised shortened timeline for data request responses, as it conflicts with other Commission rules. The parties can agree to shortened timelines on case-by-case basis as allowed under Subsection 5.