

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

In the Matter of the Proposed Rule 20 CSR     )  
4240-23.040 State Reliability Mechanism     )     **File No. EX-2026-0171**  
(SRM)     )

**STAFF COMMENTS**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”) and states as follows:

1. Staff supports the proposed rule 20 CSR 4240-23.040, published in the Missouri Register dated February 17, 2026, with a revision as detailed below. This proposed rule will establish requirements for electrical corporations to provide documentation to reflect their plans to own or have rights to sufficient capacity to meet their capacity obligations.

2. This proposed rule is necessary as a result of the passage of Senate Bill No. 4 (truly agreed to and finally passed on March 13, 2025 and signed by Governor Kehoe on April 9, 2025) which added section 393.1080, RSMo. Subsection 5 of 393.1080, RSMo, states that the Commission may promulgate rules necessary to implement the provisions of section 393.1080, RSMo.

3. This proposed rule will allow the Commission to be more informed when making decisions that impact ratepayers regarding electrical corporations’ plans to own or have rights to sufficient capacity to meet their capacity obligations, including ensuring that electrical corporations have sufficient capacity resources to provide service to their customers.

4. Staff recommends one edit to the proposed rule to reflect that the SRM Reporting Template was revised and placed on the Missouri Public Service

Commission's website on March 20, 2026. Staff edited the form to be consistent with the Americans with Disabilities Act ("ADA"). Commission rule 20 CSR 4240-23.040(2) should read:

(2) Reporting form. The SRM Reporting Template shall include the electrical corporation's plan to own or have rights to sufficient capacity to meet its capacity obligations for the upcoming planning year and each of the three (3) subsequent years. The SRM Reporting Template, revised *[December 2, 2025]* **March 20, 2026**, is hereby incorporated by reference and made a part of this rule. The SRM Reporting Template is available at [www.psc.mo.gov/](http://www.psc.mo.gov/). This rule does not incorporate any subsequent amendments or additions.

**WHEREFORE**, Staff respectfully submits these comments for the Commission's consideration and supports the proposed rule 20 CSR 4240-23.040.

Respectfully submitted,

**/s/ J. Scott Stacey**

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**ATTORNEY FOR STAFF OF THE  
PUBLIC SERVICE COMMISSION**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 24<sup>th</sup> day of March, 2026.

**/s/ J. Scott Stacey**