

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

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

**PUBLIC COUNSEL'S COMMENTS  
ON STAFF'S DRAFT FAC RULE CHANGES**

COMES NOW the Office of the Public Counsel and hereby submits the attached comments regarding the Staff's draft fuel adjustment clause (FAC) rule changes. The attached document is in a three-column table format, and the following guidelines will aid the reader in understanding what is presented in the table:

1. The second column is the guiding column of this document. It contains the Staff's draft rule changes as attached to Natelle Dietrich's September 29, 2015 e-mail.
2. The first column includes the current rules (4 CSR 240-3.161 and 4 CSR 240-20.090) that correspond to the Staff's proposal in the second column. Every section and subsection of these current rules is reproduced in this document.
3. The third column contains Public Counsel's recommendations regarding the Staff's proposed language. If there is nothing in the box in the third column, Public Counsel is not recommending changes to the Staff's draft language.
4. Yellow highlights in the third column highlight certain changes – either additions or deletions – to the Staff's draft.
5. Some cells in the third column contain language that is not highlighted. Typically this language is different enough from the Staff's to easily distinguish the two.

6. The statements in italics in the third column provide explanations for Public Counsel's proposed changes.

WHEREFORE, Public Counsel respectfully submits the attached comments.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record on October 20, 2015.

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