

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

IN THE MATTER OF THE APPLICATION OF:

BLODGETT PAINT BALL)	
& FUN FACTORY, L.L.C.)	
FOR A CHANGE OF ELECTRIC SUPPLIER)	CASE NO.: EO-2021-0163
)	
Applicant.)	

**FIRST AMENDED APPLICATION FOR A CHANGE OF
ELECTRIC SERVICE PROVIDER**

1. Applicant's address is 3897 State Highway H, Sikeston, Missouri 63801.
2. The name of Applicant's current electric service provider is Semo Electric.
3. Applicant requests the Missouri Public Service Commission to order a change of electric supplier to the address indicated above.
4. Applicant requests the Missouri Public Service Commission to order a change of electrical supplier from Semo Electric (current) to Ameren Missouri (requested).
5. Applicant requests the Missouri Public Service Commission to order a change of electric provider for the following reasons:
 - a. The Applicant's business, Blodgett Paint Ball & Fun Factory, L.L.C., is a Missouri limited liability company, which is a small business that is open approximately four days a month. This business has been open since 2008. The member of this business and her husband, David Russell, have ownership interests in other businesses that are supplied electricity by Ameren Missouri. It would be more efficient for Applicant and her and her husband's other businesses to be served by one provider;
 - b. The last few years, the monthly bills have been somewhat outrageous and, at times, over \$2,600.00 a month or more, which is different than the Ameren amounts charged to

the other businesses that are solely serviced by Ameren Missouri. This has placed an undue burden on Applicant, that is a small business operating approximately four (4) days per month; Attached are sample billing statements from Co-op to Applicant;

c. Under the way the Co-op works, there is a multiplier applied and this business, Applicant herein, is treated like a business that is not truly comparable to Applicant's business. As a result of other users, it appears that Applicant herein pays a disproportionate amount for services provided as compared to actual usage. Applicant is billed as an Industrial customer, not a small business like it actually is;

d. Ameren Missouri will bill Applicant for actual usage of electricity like Applicant's other Ameren services are billed;

e. Service from provider is severely delayed and at times the Co-op has been non-responsive. Applicant attempted to address these delays, but nothing changed by the Co-op. Applicant has ceased services due to the outrageous and disproportionate billing and delays in service work performance; and/or

f. Applicant operates for the benefit of church and religious organizations for the purpose of providing a service to the community by allowing organizations to use the real property where Applicant's business is so that church camp can occur and organizations can use the premises for outings and staying at the location. Local kids and teenagers are able to use the facility for a place to have fun. The local community and organizations greatly benefit from the property where the paint ball and cabins are located and where the electricity is needed.

6. Applicant has taken the following steps in an attempt to work out electric service problems with the electric service provider: The Applicant called engineers to explain and request a reason for the economic crunch on their business. The engineers explained that Semo Electric

was treating this business the same as an industrial facility. When there is an extra demand on current, such as when the air conditioners have to achieve a certain goal in a small timeframe to accommodate customers, where it is as slow as 15 minutes, it sets the monthly bill under the demand usage multiplier by 40. There was no other real explanation other than the electric service is within a Co-op and the rates will not change. As for slow response times, Applicant attempted to address these concerns/issues with the Co-op, but nothing changed. By Co-op, leading to Applicant terminating its services with the Co-op.

7. Currently, Applicant, due to these issues, has no service at all and is in need of connecting to and being serviced by Ameren.

WHEREFORE, for the reasons set forth herein, Applicant requests the Missouri Public Service Commission to issue an order which changes the current electric service provider from Semo Electric to Ameren Missouri accordingly, and for such other and further relief as this commission can award.

Dated this ____ day of _____, 2021.

JOHNSON, SCHNEIDER & FERRELL, L.L.C.

By:

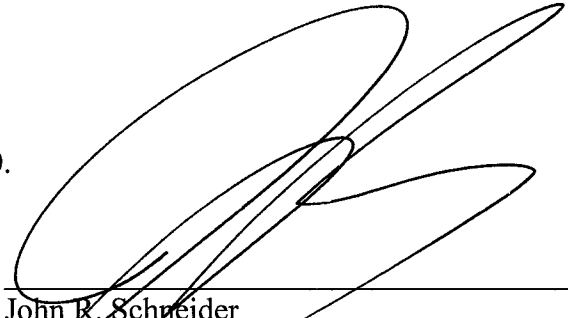
John R. Schneider No. 54194
212 North Main Street
Cape Girardeau, MO 63701
Telephone: 573-335-3300
Facsimile: 573-335-1978
Attorney for Applicant
Blodgett Paint Ball & Fun Factory, L.L.C.

CERTIFICATE OF SERVICE

The undersigned certifies that copies of the foregoing Application is filed and addressed to:

Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360
Email: pscinfo@psc.mo.gov

on this 9th day of April, 2020.



John R. Schneider

VERIFICATION BY CERTIFICATION

Margaret Russell, on oath, states that she has read the foregoing Applicant and is familiar with its contents and the matters set forth therein are true to the best of her knowledge, information and belief.

Dated this 9th day of April, 2021.

BLODGETT PAINT BALL
& FUN FACTORY, L.L.C.

By: Margaret Russell
Name: Margaret Russell
Its: Member

Subscribed and sworn to before me this 9th day of April, 2021.

Sasha Keistler
Notary Public



My Commission expires: 9-7-2023