

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

In the Matter of Blodgett Paint Ball &)
Fun Factory LLC for a Change of)
Electric Supplier) File No. EO-2021-0163

RESPONSE OF UNION ELECTRIC COMPANY D/B/A AMEREN MISSOURI

Comes Now, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) pursuant to 20 CSR 4240-2.040, et al, and the Order of the Missouri Public Service Commission (“the Commission”) dated December 8, 2020 directing Ameren Missouri to file a Response to the above styled Application on or before January 6, 2021 and states:

1. Ameren Missouri agrees with paragraph one of the Application which states that the Applicant’s address is 3897 State Highway H, Sikeston, Missouri 63801.
2. Ameren Missouri agrees with paragraph two of the Application which states that Applicant’s current electric service provider is SEMO Electric Cooperative (“SEMO”).
3. Ameren Missouri agrees with paragraph three of the Application which states that Applicant is requesting a change of electrical supplier to the address indicated above.
4. Ameren Missouri agrees with paragraph four of the Application which states that Applicant requests the Commission to order a change of electric supplier from SEMO (current) to Ameren Missouri (requested).
5. Ameren Missouri agrees paragraph five of the Application says Applicant requests the Commission to order a change of electric provider, in summary, for the following reasons:
 - a. Ameren Missouri agrees that Applicant is a Missouri Limited Liability Company in good standing. It would be inappropriate for Ameren Missouri to state whether it is a small business but has no reason to doubt the statements that it was been open since 2008 or that it

operates four days a month. Ameren Missouri agrees that the Applicant's owners, Mr. & Mrs. David Russell, have ownership interests in other businesses that are supplied electricity by Ameren Missouri. In this instance, Ameren Missouri prefers not to invade the province of the Commission by opining that it would be more efficient for Applicant's businesses to be served by one provider.

b. Ameren Missouri recognizes that the Application includes over thirty pages of Statements from SEMO to Applicant which speak for themselves. Applicant's other businesses that are solely serviced by Ameren Missouri are billed pursuant to the tariffs that have been approved by the Commission.

c. Ameren Missouri concedes that the statements reflect that SEMO charges Applicant a "Demand Charge"

d. If the Commission approves the Application, Ameren Missouri will certainly bill Applicant pursuant to the tariffs and it will be for the actual usage of electricity. But this may also include a "demand charge" or a functional equivalent depending on the Applicant's needs and requirements. Ameren Missouri has not made any representations to Applicant that Ameren Missouri's rates would be lower than SEMO's. Applicant may also incur costs associated with changing providers.

e. Ameren Missouri prefers not to offer an opinion regarding the allegations in section 5 e regarding the quality-of-service Applicant has received from SEMO.

6. Ameren Missouri recognizes that reasonable minds can differ. But at this time Ameren Missouri has insufficient information to admit or deny the allegations contained in paragraph 6 as it relates to the propriety of SEMO's billing and its response times.

7. Ameren Missouri agrees that paragraph 7 states Applicant is presently without service.

WHEREFORE, for the aforementioned reasons Ameren Missouri requests direction from the Commission regarding how it would like to proceed.

Respectfully submitted,

**Union Electric Company
d/b/a Ameren Missouri**

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CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2021, I caused the aforementioned document to be electronically filed with the Secretary of the Public Service Commission of the State of Missouri who will send a copy to counsel for all parties of record. A copy has also been emailed to them by the undersigned.

/s/ Eric Kendall Banks