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

| In the matter o | f:              |   |                       |
|-----------------|-----------------|---|-----------------------|
|                 | John R. Melton, | ) |                       |
|                 | Complainant,    | ) |                       |
|                 | •               | ) |                       |
|                 | v.              | ) |                       |
|                 |                 | ) | File No. EC-2013-0508 |
| Ozark Electric  | Cooperative,    | ) |                       |
|                 | Respondent,     | ) |                       |
|                 | -               | j |                       |

## ANSWER OF OZARK ELECTRIC COOPERATIVE

COMES NOW Ozark Electric Cooperative, Inc., (Ozark) by and through its undersigned counsel, and for its Answer to Complaint of John R. Melton respectfully states the following:

- Ozark acknowledges that it has provided and is providing electric energy and service to Mr. John R. Melton at 435 Melville St., Dadeville, Mo.
- Ozark denies that it is a "public utility" under the general jurisdiction of the Public Service Commission of Missouri. Ozark does acknowledge and admit the public safety jurisdiction of the Commission conferred at Section 394.160 RSMo.
- 3. Ozark affirmatively states that it has met with Mr. Melton and has investigated his allegations of neutral to earth voltage ("stray voltage") over a period of years. On site testing has consistently demonstrated that the Cooperative's electric distribution system is operating within prescribed standards. The Cooperative has shared with Mr. Melton its readings and observations that indicated stray voltage sources and paths associated with the customer side wiring of his house and barn.

- 4. Mr. Melton has withheld the reports and analyses that he claims to possess supporting his allegations against the Ozark electric distribution system. To the extent they have been identified Mr. Melton's consultants have not cooperated with Ozark's investigation.
- Ozark denies that its electric distribution property and system is the source of any damages sustained by Mr. Melton and demands proof of such allegations of damages and causation.
- 6. The relief requested by Complainant is in the nature of an investigation by Commission Staff. Such relief is not dependent on Respondent. Ozark has cooperated with Commission Staff (Mr. Alan Bax) in relation to Mr. Melton's allegations in the past and will continue to cooperate with Commission Staff assigned to investigate this matter.
- Correspondence, orders and other communications regarding this complaint proceeding should be directed to the undersigned.

Respectfully submitted,

ANDERECK, EVANS, WIDGER, JOHNSON & LEWIS L.L.C.

 $\mathbf{R}_{\mathbf{v}}$ 

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ATTORNEYS FOR OZARK ELECTRIC COOPERATIVE, INC.

## CERTIFICATE OF SERVICE

The undersigned certifies that a complete copy of the foregoing instrument was served upon:

General Counsel P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, MO 65102 Lewis R. Mills, Jr. P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102

John R. Melton 435 Melville St. Dadeville, MO 65635

By e-mail and/or enclosing same in envelopes addressed to the attorneys of record of said parties at their business addresses as disclosed in the pleadings of record therein, with first class postage fully prepaid, and by depositing said envelope in a U.S. Post Office mail box in Springfield, Missouri, on June 28, 2013.

Rodric A. Widger