

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

In the Matter of the Joint Application of Osage )  
Valley Electric Cooperative Association and )  
The City of Rich Hill, Missouri for Approval of a )  
Written Territorial Agreement Designating the ) File No. EO-2022-0073  
Boundaries of each Electric Service Supplier )  
Within the City of Rich Hill, Bates County, )  
Missouri )

**JOINT MOTION TO CONSOLIDATE**

COME NOW Osage Valley Electric Cooperative Association (“Osage Valley”) and the City of Rich Hill, Missouri (“Rich Hill”) (collectively, “Applicants”), by and through their respective counsel, and for their Joint Motion to Consolidate, respectfully state as follows:

1. The Applicants filed a Joint Application for Change of Suppliers on July 9, 2021 in Case No. EO-2022-0009.
2. The Change of Supplier case involves the transfer of electric utility service for all customers of Rich Hill to Osage Valley.
3. This case involves a request for approval of a Territorial Agreement concerning those same customers which would make clear that Osage Valley has all electric service rights, as between Applicants, within the City of Rich Hill.
4. Thus, both cases involve the same subject matter and the parties wish to consolidate the cases for expediency.

WHEREFORE, Applicants respectfully request that the Commission issue its order:

- (a) Granting Applicants’ Motion to Consolidate; and
- (b) Ordering all further relief and actions as necessary or convenient.

Respectfully submitted,

/s/ Megan E. Ray

---

Megan E. Ray, #62037  
Andereck, Evans, Lewis, Figg & Battagler, LLC  
3816 S. Greystone Ct., Ste. B  
Springfield, MO 65804  
(417) 864-6401 (telephone)  
(417) 864-4967 (fax)  
Email: mray@lawofficemo.com  
ATTORNEYS FOR OSAGE VALLEY  
ELECTRIC COOPERATIVE

/s/ Sarah E. Carnes

---

Sarah E. Carnes, #66576  
Lauber Municipal Law, LLC  
250 NE Tudor Rd.  
Lee's Summit, MO 64086  
(816) 525-7881 ext. 6 (telephone)  
(816) 525-7881 (fax)  
Email: scarnes@laubermunicipal.com  
ATTORNEY FOR THE CITY OF RICH HILL

## Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Joint Application was served by electronic mail or U.S. Mail, postage prepaid, this 14<sup>th</sup> day of September, 2021 upon the following:

Office of the Public Counsel  
Hampton Williams  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, Missouri 65102  
opcservice@ded.mo.gov

Missouri Public Service Commission  
Staff Counsel Department  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, Missouri 65102  
staffcounsel@psc.mo.gov

/s/ Megan E. Ray

Megan E. Ray