

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

In the Matter of the Application of Co-Mo)	
Electric Cooperative for Approval of)	File No. EO-2022-0332
Designated Service Boundaries Within)	
Portions of Cooper County, Missouri.)	
)	
In the Matter of the Application of Co-Mo)	
Electric Cooperative for Approval of)	File No. EO-2022-0190
Designated Service Boundaries Within)	
Portions of Cooper County, Missouri.)	

**JOINT RESPONSE TO PUBLIC
COUNSEL’S RESPONSE TO ORDER
DIRECTING A RESPONSE**

COME NOW Co-Mo Electric Cooperative (“Co-Mo”) and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) and for their Response to Public Counsel’s Response to the Public Service Commission’s January 4, 2023 Order (“OPC’s Response”), hereby state as follows:

1. The Commission has properly rejected the Office of the Public Counsel’s (“OPC”) request that additional notice be given. OPC has indicated that it does not request a hearing.

2. Given those circumstances, this case is ripe for a decision by the Commission. That decision should be approval of the Territorial Agreement submitted in this case, as amended by the Addendum submitted on October 19, 2022.

WHEREFORE, Co-Mo and Ameren Missouri request the Commission approve the Territorial Agreement, as amended by the above-referenced Addendum.

Respectfully submitted,

/s/ Megan E. McCord

Megan E. McCord, Mo. Bar #62037

Friel, McCord & Smiley, LLC

P.O. Box 14287

Springfield, MO 65814

Phone: (417) 227-8405

mmccord@reclawfirm.com

**ATTORNEY FOR CO-MO
ELECTRIC COOPERATIVE**

/s/ James B. Lowery

James B. Lowery, Mo. Bar #40503

JBL LAW, LLC

3406 Whitney Court

Columbia, MO 65203

(T) 573-476-0050

lowery@jblawllc.com

**ATTORNEY FOR UNION ELECTRIC D/B/A
AMEREN MISSOURI**

Dated: January 20, 2023

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on this 20th day of January 2023, to the following:

Office of the Public Counsel
Marc Poston
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/ James B. Lowery