

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

In the Matter of the Joint Application of Farmers')
Electric Cooperative and the City of Cameron)
for Approval of a Change of Electric Supplier for) Case No. _____
Certain Customers in Clinton and Caldwell)
Counties for Reasons in the Public Interest.)

JOINT APPLICATION FOR CHANGE OF ELECTRIC SUPPLIER

COME NOW Farmers' Electric Cooperative, Inc. (Farmers') and the City of Cameron (Cameron), hereinafter referred to collectively as "Applicants," and for their Joint Application, pursuant to § 394.315, RSMo, §91.025, RSMo, 4 CSR 240-2.060 and 4 CSR 240-3.140, respectfully state as follows:

APPLICANTS

1. Farmers' is a rural electric cooperative organized and existing under the laws of Missouri with its principal office at 201 W. Business Hwy. 36, P.O. Box 680, Chillicothe, MO 64601. It is a Chapter 394 rural electric cooperative corporation engaged in the distribution of electric energy and service to its members within certain Missouri counties. Farmers' has no pending action or final judgments or decisions against it from any state or federal agency or court that involve its customer service or rates within the three years immediately preceding the filing of this Joint Application. Farmers' has no overdue annual report or assessment fees. A copy of a Certificate of Good Standing from the Office of the Missouri Secretary of State for Farmers' is attached hereto and marked **Appendix A**.

2. Cameron is a Missouri city of the third class existing pursuant to §§ 77.010 and 78.430 RSMo, with its principal office and place of business at City Hall, 205 N. Main Street, Cameron, MO 64429. Cameron is engaged in the business of providing electrical, water, and sewer services to customers in its municipal service area. Cameron has no pending action or

final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or its rates, which have occurred within the three years immediately preceding the filing of this Joint Application.

3. Correspondence, communications, and orders in regard to this Joint Application should be directed to:

Padraic Corcoran
Williams & Campo, P.C.
400 SW Longview Blvd., Ste. 210
Lee's Summit, MO 64081
816-524-4646 (telephone)
816-524-4645(fax)
e-mail: pcorcoran@publiclawfirm.com

Megan E. Ray
Andereck, Evans, Widger, Lewis & Figg, LLC
3816 S. Greystone Ct., Ste. B
Springfield, MO 65804
417-864-6401 (telephone)
417-864-4967 (fax)
e-mail: mray@lawofficemo.com

FACTS

4. Farmers' currently provides electrical service to four (4) affected properties, two in Clinton County and two in Caldwell County, as listed on **Appendix B**. These properties have been annexed into the City of Cameron and are now owned in fee by the City of Cameron. These properties are located within the City of Cameron's industrial park. Three of these properties have idle services while one property has a commercial business. These four properties are served through four meters and consist of two barns, one commercial building and one unoccupied residential home. Farmers' serves the four properties in Clinton and Caldwell Counties through a single-phase overhead line that extends from NW Sale Barn Road along Highway BB to Griffin Road.

5. Cameron has requested that Farmers' allow Cameron to provide service to these four properties referenced in Paragraph 4 above so that a three phase distribution system can be constructed which would allow desired expansion of buildings and increased load capacity for the affected properties. Cameron also desires to increase load capacity to these properties to

encourage economic development in this area and to allow an existing tenant to expand its business. The City of Cameron has the exclusive right to serve all other tracts in this industrial park. This change of supplier would ensure reliable electric service now and in the future to these affected properties as well as to reduce utility duplication in this area.

The three properties with idle services are essentially stranded asset for Farmers' due to the fact that all other tracts in the industrial park have been annexed into the city limits. Due to the operation of RSMo. § 394.030(4), Cameron now has the exclusive right to serve all remaining tracts in this industrial park. It would be economically infeasible for Farmers' to perform the desired service upgrade requiring the construction of a three phase system to serve solely these four properties. Farmers' has determined that it is acceptable and prudent to agree to retire and remove its segment of distribution line that now serves these four properties in order for said properties to be provided increased load capacity by Cameron.

Farmers' removal of its current line serving these four properties would reduce utility duplication in this area and would eliminate utility crossings between Farmers' and Cameron. Cameron has an existing electric distribution line in close proximity to these four properties that is located at Bob F. Griffin Road and Highway BB. In order to provide service to these four properties, Cameron will be required to construct a three phase overhead electric line extension that will be approximately 5110 feet in length. It is therefore proposed that the Commission approve a change of supplier for current and future tenants of these four properties which will allow Farmers' to retire its service facilities and allow Cameron to provide enhanced service to the entire industrial park.

6. A diagram of the properties, Cameron's existing lines and Farmers' existing lines are attached hereto and marked **Appendix C**. All relevant properties are located within the city

limits of Cameron and within Clinton and Caldwell Counties in Missouri. Cameron is authorized to serve this area under Section 91.450 RSMo.

7. All four properties are owned by Cameron which, through this Application, consents to and desires this proposed change. Currently only one property has a tenant. Said tenant has consented to the proposed change of supplier from Farmers' to Cameron and its written consent is attached hereto as **Appendix B.**

STATUTE

8. Section 394.315.2, RSMo provides in relevant part that “[t]he public service commission, upon application made by an affected party, may order a change of suppliers on the basis that it is in the public interest for a reason other than rate differential, and the commission is hereby given jurisdiction over rural electric cooperatives to accomplish the purpose of this section.”

9. Section § 91.025, RSMo provides in relevant part that “[t]he public service commission, upon application made by a customer, may order a change of suppliers on the basis that it is in the public interest for a reason other than a rate differential, and the commission is hereby given jurisdiction over municipally owned or operated electric systems to accomplish the purpose of this section.”

PUBLIC INTEREST

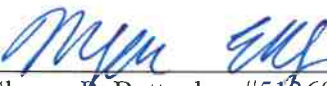
10. The proposed change of supplier is in the public interest because it will allow upgraded load capacity and will ensure reliable electric service for these four properties. The change also encourages economic development in this area and reduces utility duplication. Thus, the proposed change of supplier is in the public interest for a reason other than a rate differential.


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

(a) Finding that the change of electric supplier proposed herein is in the public interest and approving the proposed change of electric supplier and granting this Joint Application; and

(b) Granting such other relief as is deemed necessary to accomplish the purposes of this Joint Application.

Respectfully submitted,


Shawn P. Battagler, #51360
Megan E. Ray, #62037
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ATTORNEYS FOR FARMERS'
ELECTRIC COOPERATIVE


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816-524-4645 (fax)
Email: pcorcoran@publiclawfirm.com
ATTORNEY FOR THE CITY OF CAMERON

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 5th day of April, 2018 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

Russ A. Knudsen
eTruck Transportation, LLC
P.O. Box 540698
Omaha, NE 68154



Megan E. Ray

VERIFICATION

STATE OF MISSOURI)
)ss
COUNTY OF Greene)

Being first duly sworn, Megan E. Ray states as follows: that she has read the foregoing application and the facts and allegations contained therein are true and correct to the best of her knowledge, information and belief and that the law firm of Andereck, Evans, Widger, Lewis & Figg, LLC is authorized by Farmers' Electric Cooperative, Inc. to make this filing and represent it in this matter.

Megan E. Ray
Megan E. Ray

Subscribed and sworn to before me this 28th day of March, 2018.

Amanda M. Jeane
Notary Public



VERIFICATION

STATE OF MISSOURI)
)ss
COUNTY OF DeKalb)

I, Mark Gaugh state that I am employed by the City of Cameron (Cameron) as City Manager; that I have read the above and foregoing document; that the statements contained therein are true and correct to the best of my information, knowledge and belief; and, that I am authorized to make this statement on behalf of Cameron.

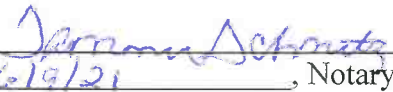


Mark Gaugh, City Manager

Subscribed and sworn to before me this 18th day of December, 2017.



TAMMIE SCHMITZ
My Commission Expires
June 9, 2021
DeKalb County
Commission #13815521



6/9/21, Notary Public

STATE OF MISSOURI



John R. Ashcroft
Secretary of State

CORPORATION DIVISION
CERTIFICATE OF GOOD STANDING

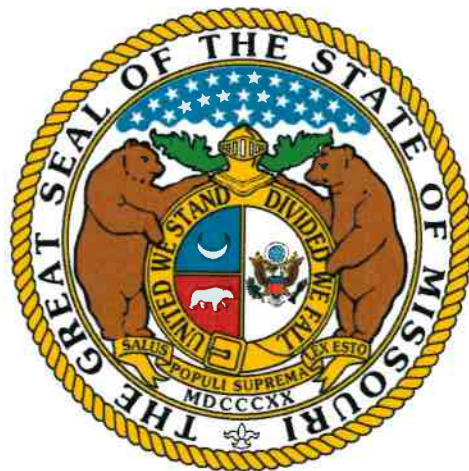
I, JOHN R. ASHCROFT, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

FARMERS' ELECTRIC COOPERATIVE, INCORPORATED
Q00061739B

was created under the laws of this State on the 3rd day of September, 1938, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 23rd day of March, 2018.


Secretary of State



Certification Number: CERT-03232018-0034

Consent of Legal Owner / Tenant

1. 11430 NE Tri-county Line Rd, Cameron, MO
County: Clinton
Owner: City of Cameron
Tenant: eTruck Transportation – see attached consent.
2. No known address, NE Tri-County Line Road, Cameron, MO
County: Clinton
Owner: City of Cameron
Tenant: No tenant.
3. No known address, Highway BB, Cameron, MO
County: Caldwell
Owner: City of Cameron
Tenant: No tenant.
4. No known address, Highway BB, Cameron, MO
County: Caldwell
Owner: City of Cameron
Tenant: No tenant.

Appendix B

Tenant Consent Affidavit

STATE OF Nebraska)
)ss
COUNTY OF Douglas)

BEFORE ME, the undersigned authority, personally appeared Russ A. Knudsen, who, being duly sworn, states on his oath or affirmation as follows:

1. My name is Russ A. Knudsen, and I am currently the President of eTruck Transportation, LLC (hereinafter "eTruck"), whose business address is P. O. Box 540698 Omaha, Nebraska 68154.
2. I am duly authorized to make this Affidavit on behalf of eTruck and the execution of this Affidavit is the free act and deed of myself and the free act and deed of eTruck.
3. I am of sound mind and capable of making this Affidavit and am personally acquainted with the facts stated herein.
4. eTruck, and the City entered into a lease agreement dated August 15, 2017 concerning an existing structure owned by the City of Cameron, Clinton, DeKalb, and Caldwell counties, Missouri (hereinafter "City") that is currently receiving electric service from Farmers' Electric Cooperative (hereinafter "Farmers'") within the cooperate boundaries of the City.
5. eTruck desires to expand the existing structure for operation of its business and requires 3 phase electric to properly carry out its business objectives.
6. eTruck consents, favors, and has no objection to the Joint Application for Change of Supplier by Farmers' and the City.



Affiant

RUSSELL A. KNUDSEN

Printed Name

Subscribed and sworn to before me this 15 day of December, 2017.

Bonnie M. Allen

Notary Public
SEAL

