

order would remove that territory from Ameren Missouri's certificated service territory but, nonetheless, have negotiated one at Staff's request in order to facilitate the transfer of customers.

4. In accordance with 20 CDSR 4240-3.130(1)(A), a copy of the proposed Territorial Agreement can be found in Attachment A to this pleading. Additionally, the legal description of the territory at issue was previously submitted and can be found in I Attachment B to Appendix 1 of the Joint Application.

5. 20 CSR 4240-3.130(1)(B) requires a list of other electric utilities that service in the area of the Territorial Agreement. There is no other electric utility in the area at issue and thus none to list.

6. 20 CSR 4240-3.130(1)(C) Attachment B to this pleading is a clean and red lined illustrative tariff showing change in the certificate area.

7. For all of the reasons set forth in paragraph 11 of the Joint Application and as required by 20 CSR 4240-3.130(1)(D), this transaction is not detrimental to the public interest. In fact, this arrangement goes beyond the standard required and is to the benefit of the public interests as it simplifies the provision of electrical service and reduces confusion about that service for customers.

8. A list of all persons or structures impacted by this agreement has been previously submitted as Attachment B to Appendix 1 to the Joint Application, as required by 20 CSR 4240-3.130(1)(E).

9. For all of the reasons set forth above and as set forth in the Joint Application, the Joint Applicants believe this transaction is in the public interest for reasons other than a rate differential and believe that it should be approved.

WHEREFORE, the Joint Applicants respectfully request that the Commission approve the Territorial Agreement and allow for the service territory to be transferred to the Board of Municipal Utilities of the City of Sikeston, Missouri from Ameren Missouri.

Respectfully submitted,

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For BOARD OF MUNICIPAL UTILITIES OF THE CITY OF SIKESTON, MISSOURI

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel on this via electronic mail (e-mail) on this 6th day of October, 2021.

/s/ Wendy Tatro

Wendy K Tatro