

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

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

**MOTION FOR EXPEDITED TREATMENT AND
TO ESTABLISH PROCEDURAL SCHEDULE**

COMES NOW Co-Mo Electric Cooperative (“Co-Mo”) pursuant to 20 CSR 4240-2.080, and for its *Motion for Expedited Treatment and to Establish Procedural Schedule* (“Motion”), respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. Co-Mo filed its Application for Approval of Designated Service Boundaries Within Portions of Cooper County, Missouri on January 18, 2022 (“Application”).
2. Co-Mo desires that the Application be processed as expeditiously as possible while providing a fair opportunity for parties to have meaningful input about the subject of the Application.
3. As stated in Co-Mo’s Affidavit and Verification dated January 19, 2022 attached to its Motion for Waiver of 60 Day Notice, the landowner (“customer/member”) has expressed that time is of the essence in obtaining an electric supplier for the subject property. See *Affidavit and Verification* at ¶ 3.
4. As stated in the Commission’s Order dated January 20, 2022, RSMo 386.800.3 “requires the Commission to rule on an application no later than 120 days from the application’s filing date, unless otherwise ordered by the Commission for good cause shown [...].”
5. Co-Mo requests that this Application be expedited in order to prevent harm to the

customer/member which would occur should this case be extended beyond 120 days.

6. Co-Mo respectfully requests that the Commission establish a procedural schedule which would have the Commission rule on the Application no later than May 20, 2022, 120 days from the Application's filing date as anticipated in RSMo 386.800.3.
7. This Motion was filed as soon as Co-Mo had cause for concern that this case may extend beyond 120 days due to the filing of Ameren's Motion to Dismiss on February 8, 2022 and the subsequent Order from the Commission ruling that Ameren's Motion to Dismiss was insufficient on February 9, 2022. Co-Mo anticipates Ameren will re-file a compliant Motion to Dismiss and is concerned that the procedural timeline for a subsequent Motion to Dismiss as well as any discovery the parties may request may well delay this case beyond 120 days which would cause injury to the customer/member. Co-Mo will respond expeditiously to any subsequent Motion to Dismiss filed by Ameren.

WHEREFORE, Co-Mo respectfully requests that the Commission issue an Order granting expedited treatment of this Application and in support thereof, issue an Order setting out a procedural schedule which places the date the Commission shall rule on the Application no later than May 20, 2022. Co-Mo requests such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

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