

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

In the Matter of the Application of Nancy and Ron)
Gilkey Jr. for a Change of Electrical Supplier) Case No. EO-2009-0315

STAFF'S MOTION TO ADD PARTIES

COMES NOW the Staff of the Missouri Public Service Commission (Staff), through the undersigned counsel, and requests the Missouri Public Service Commission (Commission) add the City of Rich Hill, Missouri (Rich Hill) and Osage Valley Electric Cooperative (Cooperative) as necessary parties to this case. For its Motion, Staff respectfully states the following:

1. On March 5, 2009, the Commission received an Application from Mr. Harold Caskey, on the behalf of his clients Nancy and Ron Gilkey, Jr. (Applicants). The Applicants request a change in electrical supplier from Rich Hill to the Cooperative.
2. The Applicants state the request for a change in electrical supplier “is due to safety concerns because there is something wrong with their electrical service and they fear there could be a fire.”
3. If an application cites service issues as a reason for the request, 4 CSR 240-3.140 (1)(E) and (F) require the applicant to provide a description of the problems and dates of occurrence, a description of the contacts which applicant has had with the current supplier regarding the problems, and what efforts the current supplier has made to solve the problems.
4. On March 9, 2009, the Commission issued an Order Directing Filing, directing the Staff to file a recommendation by April 8, 2009. While the Order did not add Rich Hill and the Cooperative as parties to this case, Staff respectfully requests the Commission do so.

5. If made parties, any Commission order will be binding upon Rich Hill and the Cooperative. Additionally, Staff will be able to submit data requests to Rich Hill and the Cooperative regarding the safety and service concerns of the Applicants.

WHEREFORE, the Staff requests the Missouri Public Service Commission add the City of Rich Hill, Missouri and Osage Valley Electric Cooperative as necessary parties to this case.

Respectfully submitted,

/s/Jennifer Hernandez

Jennifer Hernandez

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on the Office of the Public Counsel, P.O. Box 2230, 200 Madison Street, Suite 650, Jefferson City, MO 65102, opcservice@ded.mo.gov , the City of Rich Hill, Missouri, 120 N. 7th, Rich Hill, MO 64779, rhcityhall@inetvisions.net , Osage Valley Electric Cooperative, Legal Department, P.O. Box 151, 1321 North Orange, Butler, MO 64730-0151, and Harold L. Caskey, Caskey Hopkins Law Firm, P.O. Box 45, 8 N. Delaware, Butler, MO 64730, caskeylf@iland.net this 25th day of March, 2009, either by hand delivery, electronic mail or First Class United States Mail, postage prepaid.

/s/ Jennifer Hernandez