

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

In the Matter of the Application of the City	)	
of Farmington for a Change of Electric	)	
Supplier from Union Electric Company d/b/a	)	File No. EO-2018-0058
Ameren Missouri to City of Farmington	)	
Light & Water	)	

**AMEREN MISSOURI’S RESPONSE TO THE CITY OF FARMINGTON’S  
APPLICATION TO CHANGE ELECTRIC SERVICE PROVIDER**

In accordance with, and in response to, the Commission’s August 29, 2017, *Order Directing Notice, Adding Party, and Directing Responses to Application*, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) makes the following response to the City of Farmington’s (“the City”) *First Amended Application for Change of Electric Service Provider*:

1. On September 8, 2017, the City filed its *First Amended Application for Change of Electric Service Provider* (“the Application”), which seeks authority to transfer to City of Farmington Light and Water responsibility for providing electric service to street lights located on Holly Tree Lane. Although those street lights are within Ameren Missouri’s certificated service area and have received electric service from the Company for many years, the City recently annexed the Holly Tree Lane area. Because it currently provides water, sewer, and electric service to adjacent areas, the City seeks authority to also provide electric service to the Holly Tree Lane street lights. But the Application expressly states the City’s request to change electric service providers “is limited to the street lights located on Holly Tree Lane and no other service areas or structures are involved . . .”

2. Ameren Missouri does not oppose the City's request to change electric service providers for the Holly Lane Street lights, and would not object to the Commission issuing an order granting that limited request. However, the Company wants to make clear its accession to the City's request is limited to the street lights identified in the Application and nothing more. Ameren Missouri's decision to accede to the City's limited request is based in large part on the Company's recognition that street lighting is a service most municipalities provide their residents either through electricity from the municipality itself or procured from an electric utility or electric cooperative.

3. Although Ameren Missouri does not oppose the City's request, the Company takes no position on whether the Application satisfies legal standards that govern requests to change electric suppliers.

4. For many years Ameren Missouri has provided safe and reliable retail electric service to customers in areas adjacent to the City of Farmington, and although the City recently annexed some of those areas the Company has no desire to relinquish its right to continue to serve those customers. Therefore, neither the City nor the Commission should infer from Ameren Missouri's accession to the City's limited request any indication the Company will act similarly to requests to change electric suppliers the City might choose to file in the future.

WHEREFORE, for the reasons stated above, Ameren Missouri does not oppose the City's request to change providers of electric service to street lights located on Holly Tree Lane and would not object to a Commission order granting that specific request.

Respectfully submitted,

/s/ L. Russell Mitten  
L. Russell Mitten, #27881  
Brydon, Swearngen & England, P.C.  
312 East Capitol Avenue

P.O. Box 456  
Jefferson City, MO 65102  
(573) 635-7166 (telephone)  
(573) 634-7431 (facsimile)  
[rmitten@brydonlaw.com](mailto:rmitten@brydonlaw.com)

Wendy Tatro, #60261  
Director – Assistant General Counsel  
Ameren Missouri  
1901 Chouteau Ave.  
P. O. Box 149 (MC 1310)  
St. Louis, MO 63166  
(314) 554-3533 (telephone)  
(314) 554-4014 (facsimile)  
[AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

ATTORNEYS FOR UNION ELECTRIC COMPANY  
d/b/a AMEREN MISSOURI

**CERTIFICATE OF SERVICE**

I certify a true and correct copy of the foregoing document was sent via electronic mail on  
this 28<sup>th</sup> day of September, 2017, to:

General Counsel  
Missouri Public Service Commission  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Office of the Public Counsel  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

R. Scott Reid  
Schnapp, Fall, Silvey, Reid & Bollinger  
[sreid@schnapplaw.com](mailto:sreid@schnapplaw.com)

/s/ L. Russell Mitten