

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

In the Matter of the Application of	)	
Barrel 53 Cooperage for a Change of	)	File No. EO-2021-0305
Electric Supplier	)	

**RESPONSE OF UNION ELECTRIC COMPANY D/B/A AMEREN MISSOURI**

Comes Now, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) pursuant to 20 CSR 4240-2.040, et al, and the Order of the Missouri Public Service Commission (“the Commission”) dated March 22, 2021 directing Ameren Missouri to file a Response to the above styled Application on or before April 21, 2021 and states:

1. Ameren Missouri agrees with paragraph one of the Application which states that the Applicant is a limited liability company in good standing. Ameren Missouri also agrees Applicant operates a barrel cooperage and stave mill in the area that is the subject of this Application.

2. Ameren Missouri agrees with paragraph two of the Application which states that Applicant currently receives electric power for a portion of its premises from Howard Electric Cooperative (“Howard Electric”).

3. Ameren Missouri agrees with paragraph three of the Application which states inter alia that Howard Electric is a rural electrical cooperative in good standing with the Missouri Secretary of State.

4. Ameren Missouri agrees with paragraph four of the Application which states that it supplies electrical power to Applicant. Ameren Missouri requests permission, to respond to the remaining allegations, to the extent it can, when it responds to the pending Data Requests that have been submitted by Staff. But Ameren Missouri may not be able to offer an opinion on the

statement “the majority of Applicant’s business facilities currently receive electrical power from Ameren” since it is not privy to Howard Electric’s billing records.

5. Ameren Missouri agrees with paragraph five of the Application including the statement that it is a regulated electrical utility, and it is a corporation in good standing with the Missouri Secretary of State.

6. Ameren Missouri agrees with paragraph six of the Application that states Applicant requests the Commission to order a change of electric supplier from Howard Electric to Ameren Missouri.

7. Applicant’s allegations contained in its section seven consists of approximately three pages of statements. Most of these statements such as “due to the COVID-19, Applicant has already had to lay off eight (8) of its fourteen employees” are impossible for Ameren Missouri to answer. However, in the spirit of the trying to be as cooperative as possible as the Commission decides this important issue, Ameren Missouri summarizes its primary observations as follows:

a. **Public Safety Needs.** Ameren Missouri views public safety as its primary obligation to its customers. However, it is not prepared to state at this time that public safety needs and concerns would be better served by a single electrical power supplier providing electrical power to the entirety of Applicants business facilities this early in the process.

b. **Elimination of Duplicative Services.** Ameren Missouri recognizes that elimination of duplicative services is very important, almost as important as public safety, but it is unable to concede at this time that this Application should be approved by the Commission based on the argument of duplication of services.

c. **Positive Economic Development Impact.** Ameren Missouri realizes that a “rising tide lifts all ship” hence its prime directive includes promoting economic development and the affordability of electrical service in its service area. Indeed, Ameren Missouri has recently

participated in a contested hearing premised on its desire to offer new products and services that will facilitate affordable rates. But Ameren Missouri is not prepared to state during this stage of this review that shifting one customer from one electrical provider to another will “have a positive impact on economic development in the area.”

8. It is impossible for Ameren Missouri to offer an opinion regarding the negotiations between Applicant and Howard Electric which because Ameren Missouri was not a party to these discussions. Therefore, it will neither confirm nor deny these allegations.

9. Until discovery is complete, and the direct testimony of Applicant is filed Ameren Missouri is unable to take a position on the allegation that “a change in electrical service provider from Howard Electric Cooperative to Ameren is in the public interest for reasons other than a rate differential.”

**WHEREFORE**, for the aforementioned reasons Ameren Missouri requests direction from the Commission regarding how it would like to proceed.

Respectfully submitted,

**Union Electric Company  
d/b/a Ameren Missouri**

**Banks Law LLC**

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2021, I caused the aforementioned document to be electronically filed with the Secretary of the Public Service Commission of the State of Missouri who will send a copy to counsel for all parties of record. A copy has also been emailed to them by the undersigned.

/s/ Eric Kendall Banks