**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

**In the Matter of the Application of Matthew )**

**Delia for Change of Electric Supplier from ) File No. EO-2023-0108**

**Southwest Electric Cooperative to The )**

**Empire District Electric Company d/b/a )**

**Liberty Utilities )**

**RESPONSE OF SOUTHWEST ELECTRIC COOPERATIVE**

**TO APPLICATION OF MATTHEW DELIA**

**FOR A CHANGE OF ELECTRIC SUPPLIER FROM SOUTHWEST ELECTRIC COOPERATIVE TO THE EMPIRE DISTRICT ELECTRIC COMPANY d/b/a LIBERTY**

COMES NOW Southwest Electric Cooperative (“SWEC”) by and through its undersigned counsel, and for its response to the Application of Matthew Delia (“Applicant”) for Change of Electric Supplier, respectfully states as follows:

1. SWEC admits that Applicant’s address is 416 West Saddleclub Rd., Fair Grove, Missouri 65648.
2. SWEC admits that SWEC provides electric energy and service to the location referenced in Paragraph 1.
3. SWEC acknowledges that Applicant has requested a change of electrical supplier.
4. SWEC admits that Applicant has requested a change of supplier from SWEC to Liberty Utilities.
5. SWEC admits that Applicant has provided a reason for the requested change of supplier including a desire to change from a smart meter to an analog meter for purported health reasons.
6. SWEC admits that Applicant has asked SWEC to change out his meter for an analog meter and has been informed by SWEC that it no longer supports analog meters.
7. On information and belief Liberty Utilities also does not support or offer analog meters and has so informed applicant.
8. SWEC has and will continue to adequately meet the customer’s power needs in term of amount and quality.
9. SWEC denies that any modern smart meters create a health concern, but SWEC more specifically avers that it uses a powerline carrier technology that does not use radio frequencies, the source of alleged health concerns according to some.
10. A change in supplier would lead to unnecessary expense and duplication of services and facilities.
11. A change in electric power supplier in this case is not in the public interest, nor is such request supported by Missouri law or the regulations promulgated by the Missouri Public Service Commission on this subject matter.
12. For the above stated reasons SWEC requests that the Application be Denied.
13. Correspondence, orders, and other communications regarding this Application should be directed to the undersigned.

Respectfully submitted,

**CARNAHAN EVAN, PC**

By: /s/ Shawn Battagler

Shawn Battagler

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Attorneys for Southwest Electric Cooperative

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true copy of the foregoing Petition was served by electronic mail or U.S. Mail, postage prepaid, this \_\_\_ day of November, 2022 upon the following:

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