

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

In the Matter of the Application of Jerry L.)
Countryman for Change of Electric Supplier)
From Empire District Electric Company)
d/b/a Liberty to White River Valley Electric)
Cooperative, Inc.)

File No. EO-2022-0226

**REBUTTAL TESTIMONY OF
WHITE RIVER VALLEY ELECTRIC COOPERATIVE, INC.**

COMES NOW White River Valley Electric Cooperative, Inc. (“White River”), and in response to the direct testimony of Applicant Jerry L. Countryman in this cause, hereby submits this rebuttal testimony for the Commission’s consideration:

1. Applicant Jerry L. Countryman is a current customer of Liberty Utilities, receiving service at his five-acre homestead located at 451 North Countryman Road, Ozark, Missouri 65721, which is located just outside of the city limits of Ozark, Missouri, where he has received retail residential electric service from Liberty Utilities since approximately 1977.

2. The buildings, improvements, and facilities that are the subject of this case are not within an area subject to an existing territorial agreement between White River and Liberty Utilities.

3. It is believed that the Countryman home presently receives 200-amp residential electric service from Liberty Utilities, with overhead electric distribution and a line that terminates behind this home and runs a stretch of approximately 715 feet across the Countryman home parcel to the meter pole, consisting of a wire span with four (4)

utility poles across the western edge of the property (See **Exhibit A** attached hereto and incorporated herein by this reference).

4. For White River to serve Mr. Countryman, new facilities would need to be constructed to extend the lines and poles to serve the Countryman home, and it is anticipated that a 325-foot wire span would be required along with two or three poles for this purpose.

5. From the record, it appears that Mr. Countryman has an inherited interest in adjoining real estate consisting of approximately 22.25 acres, and that acreage is presently served by White River with electric service provided to a barn and shed on that adjacent property.

6. Although Mr. Countryman desires White River to serve the Countryman home on the five-acre tract, Missouri law governing the change of electric supplier does not appear to be accommodating of that request based on the legal analysis that must be followed on the facts of this case.


7. Although White River would be willing to serve the five-acre tract referenced as 451 North Countryman Road, the decision rests with the Commission on the request made herein for a change of electric supplier.

8. Accordingly, White River stands on the record before the Commission, along with the testimony and recommendations supplied, and will stand ready to honor the Commission's decision once made with respect to this Application.

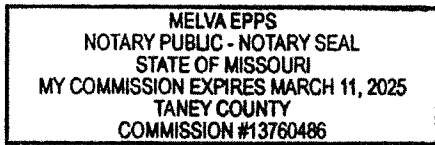
VERIFICATION

STATE OF MISSOURI)
) ss
COUNTY OF TANEY)

Now, on this 18th day of August, 2022, Beau Jackson, Manager of Engineering and Development for White River Valley Electric Cooperative, Inc., hereby states and affirms that facts contained within the above Rebuttal Testimony supplied on behalf of the Cooperative is truthful and accurate, according to his best knowledge, information, and belief, and submitted pursuant to this Commission's Order in this cause.


Beau Jackson
Manager of Engineering and Development
White River Valley Electric Cooperative, Inc.

SUBSCRIBED AND SWORN before this this 18th day of August, 2022.




Notary Public

Melva Epps
Name Printed

[stamp above]

Respectfully submitted,
CARNAHAN EVANS PC

By _____


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Exhibits

Exhibit A Aerial Map of Electric Services

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above document was filed in EFIS on this 21st day of August, 2022, with notice of the same sent to all counsel of record. A copy was also provided by U.S. Mail, postage prepaid to the pro se Applicant and by electronic transmission to counsel for Staff, OPC, The Empire District Electric Company.

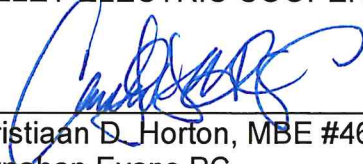
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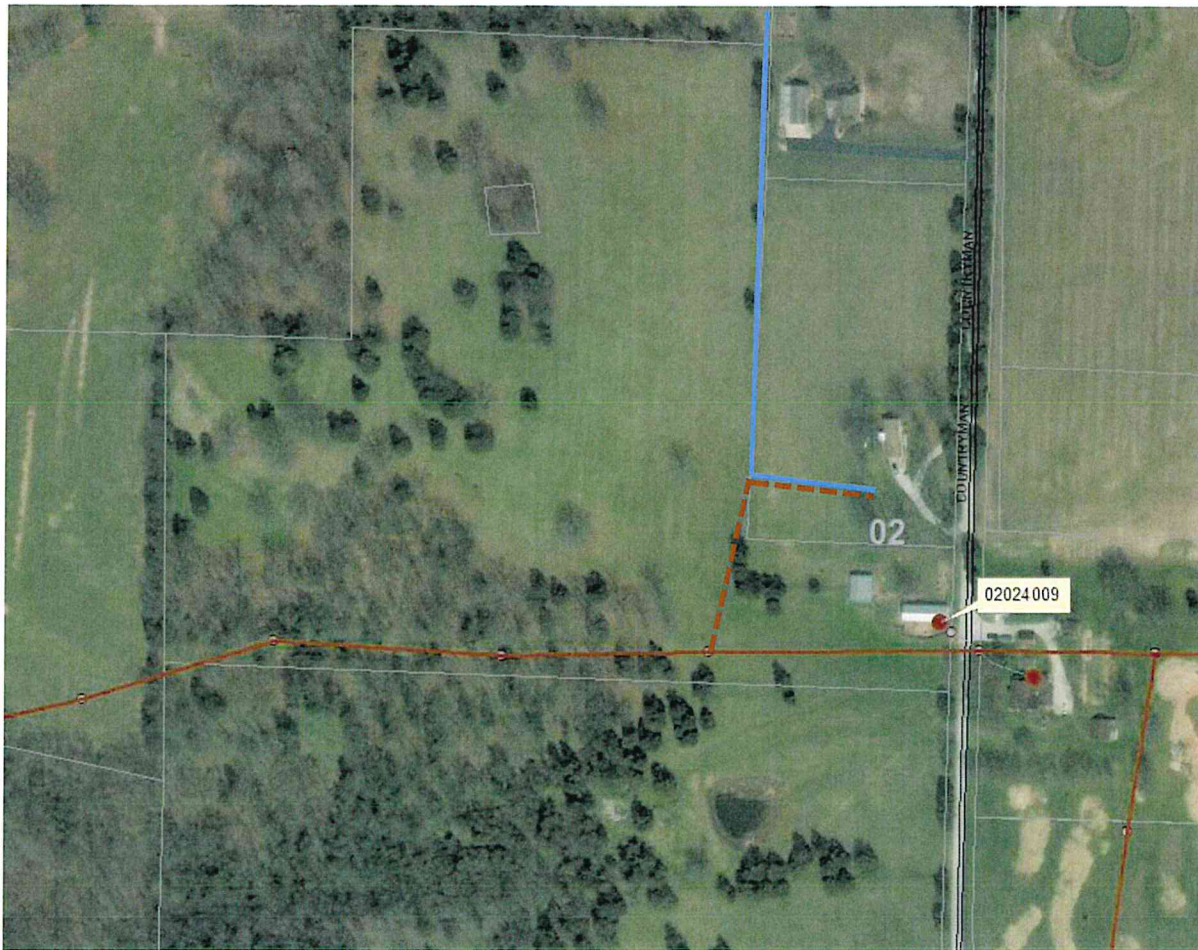
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Legend

Blue Line is Liberty Utilities' existing service line to residence at 451 North Countryman Rd., Ozark, MO

Solid Brown Line is White River Electric's existing service line to barn on adjacent parcel

Dashed Brown Line is a potential line extension for New Service that Mr. Countryman is requesting