

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

In the matter of the Application of	)	
Nancy Price for a Change of	)	
Electric Service Provider from Tri-	)	<b><u>Case No. EO-2015-0017</u></b>
County Electric Cooperative to Union	)	
Electric Company d/b/a Ameren	)	
Missouri	)	

**RESPONSE OF TRI-COUNTY ELECTRIC COOPERATIVE**

COMES NOW Tri-County Electric Cooperative Association, (TCEC) by and through its undersigned counsel, and for its Response to the Application of Nancy Price for Change of Electric Service Provider respectfully states the following:

1. TCEC acknowledges that it provides electric energy and service to the location known as 3001 E. Illinois St., Kirksville, MO, 63501.
2. The records of TCEC reflect that the membership at that location is in the name of Donald Price and it is not a joint account with applicant Nancy Price.
3. TCEC opposes the application of Nancy Price for the following reasons:
  - a. Nancy Price is not the proper party to apply for change of supplier at this location. She is not the member served with accountability for energy service charges.
  - b. Nancy Price has not alleged sufficient cause under Missouri statutes to support a finding that a change of supplier is in the public interest. She alleges that “the price is a big reason” for her request and rate differential is not an allowed cause.
  - c. Nancy Price has not alleged that there is any deficiency in the electric service provided by TCEC as an energy provider. Her complaint about “power outages

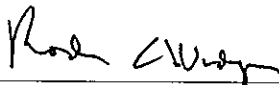
during storms” and lengthy restoration time are non-specific in date and time, and reflect only the common hazard of the industry.

d. Nancy Price errs to create the impression that this service is isolated from other TCEC service locations.

4. TCEC respectfully requests that the application be denied and dismissed.
5. Correspondence, orders, and other communications regarding this application should be directed to the undersigned.

Respectfully submitted,

**ANDERECK, EVANS, WIDGER,  
JOHNSON & LEWIS L.L.C.**

By:   
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ATTORNEYS FOR  
TRI-COUNTY ELECTRIC  
COOPERATIVE ASSOCIATION

**CERTIFICATE OF SERVICE**

The undersigned certifies that a complete copy of the foregoing was served upon:

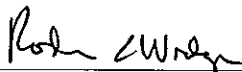
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By e-mail and/or enclosing same in envelopes addressed to the attorneys of record of said parties at their business addresses as disclosed in the pleadings of record therein, with first class postage fully prepaid, and by depositing said envelope in a U.S. Post Office mail box in Springfield, Missouri, on AUGUST 5, 2014.

  
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Rodric A. Widger