**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

**In the Matter of the Application )**

**Of Jennifer Dutcher for a ) File No. EO-2022-0320**

**Change of Electric Supplier )**

**RESPONSE OF PLATTE-CLAY ELECTRIC COOPERATIVE, INC.**

**TO APPLICATION OF JENNIFER DUTCHER**

**FOR A CHANGE OF ELECTRIC SUPPLIER**

COMES NOW Platte-Clay Electric Cooperative, Inc. (“Platte-Clay”) by and through its undersigned counsel, and for its response to the Application of Jennifer Dutcher (“Applicant”) for Change of Electric Supplier, respectfully states as follows:

1. Platte-Clay admits that Applicant’s address is 13400 N. Congress Ave., Kansas City, Missouri 64163.
2. Platte-Clay admits that Evergy provides electric energy and service to the location referenced in Paragraph 1.
3. Platte-Clay acknowledges that Applicant has requested a change of electrical supplier.
4. Platte-Clay admits that Applicant has requested a change of supplier from Evergy to Platte-Clay.
5. Platte-Clay admits that Applicant has provided several reasons for the requested change of supplier including service issues and issues regarding response to outages.
6. Platte-Clay admits that Applicant has reached out to it for help with the electric service issues at various times.
7. Platte-Clay supports the Application for the following reasons:
   1. Applicant has alleged sufficient cause under Missouri statutes to support a finding that a change of supplier is in the public interest.
      1. Applicant has alleged deficiency in the electric service provided by Evergy as an energy provider. Platte-Clay offers that the situation is not ideal for Evergy, Platte-Clay nor Applicant and Evergy is not necessarily to blame for these issues.
      2. Platte-Clay and Evergy have a Territorial Agreement governing service areas surrounding Applicant. Subsequent to the Territorial Agreement, there were rare situations in which “border customers” were located in the city limits of Kansas City or Smithville but Evergy’s predecessor did not have any facilities close to the customer. In that situation, Evergy’s predecessor would connect to Platte-Clay’s facilities with transformers, primary lines, secondary lines, etc. to run service to the customer to be in compliance with the Territorial Agreement.  The customer would be an Evergy customer. When outages occur, the problem could be on either Platte-Clay or Evergy and it is obviously a difficult situation for Evergy to deal with. For this reason, Platte-Clay believes that it is in the public interest to allow Applicant to be solely served by Platte-Clay.
8. Platte-Clay requests that the Application be approved.
9. Correspondence, orders, and other communications regarding this Application should be directed to the undersigned.

Respectfully submitted,

**FRIEL, McCORD & SMILEY, LLC**

By: /s/ Megan E. McCord

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ATTORNEYS FOR PLATTE-CLAY 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 21st day of June, 2022 upon the following:

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/s/ Megan E. McCord