

PUBLIC SERVICE COMMISSION BEFORE THE OF THE STATE OF MISSOURI



In the Matter of the Application of)
The Empire District Electric Company)
for a Certificate of Public Convenience)
and Necessity Authorizing It to Construct,)
Install, Own, Operate, Control, Manage)
and Maintain an Electric Transmission)
and Distribution System to Provide Electric)
Service in an Area in Greene County,)
Missouri.)

Case No. EA-99-172

REPORT AND ORDER

Issue Date: December 7, 1999

Effective Date: December 17, 1999

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OF THE STATE OF MISSOURI

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APPEARANCES

Gary W. Duffy, Attorney at Law, Brydon, Swearingen & England, P.C., P.O. Box 456, 312 East Capitol Avenue, Jefferson City, Missouri 65102-0456, for The Empire District Electric Company.

Jeffrey A. Keevil, Attorney at Law, Stewart & Keevil, 1001 Cherry Street, Suite 302, Columbia, Missouri 65201, for City of Springfield, Missouri, through the Board of Public Utilities.

Rodric A. Widger, Attorney at Law, Andereck, Evans, Milne, Peace and Baumhoer, P.O. Box 4929, 1111 S. Glenstone, Springfield, Missouri 65808, for Southwest Electric Cooperative, Ozark Electric Cooperative and Webster Electric Cooperative.

John B. Coffman, Deputy Public Counsel, P.O. Box 7800, Jefferson City, Missouri 65102-7800, for Office of the Public Counsel and the Public.

David J. Stueven, Assistant General Counsel, P.O. Box 360, Jefferson City, Missouri 65102, for the Staff of the Missouri Public Service Commission.

REGULATORY LAW JUDGE: Morris L. Woodruff

REPORT AND ORDER

Procedural History:

The Empire District Electric Company (Empire) applied to the Commission on October 20, 1998, for a certificate of public convenience and necessity authorizing it to construct, install, own, operate, control, manage and maintain an electric transmission and distribution system to provide electric service in portions of Greene County, Missouri. Empire is a Kansas corporation and is qualified to do business as a foreign corporation in Missouri. Empire's principal office is located at 602 Joplin Street, Joplin, Missouri 64802.

Empire is currently authorized to provide electric service in portions of Greene County, Missouri. Its application requests authority to expand its service area in Greene County to include specified areas in and around the cities of Republic, Willard and Strafford. In addition, the application seeks authority to serve an area near the Christian/Greene County line.

The Commission issued an Order and Notice on October 23, 1998. That order provided notice of Empire's application to the public and indicated that any interested person wishing to intervene was to file an application with the Commission on or before November 23, 1998. On November 16, 1998, Southwest Electric Cooperative, Ozark Electric Cooperative and Webster Electric Cooperative (collectively known as the Cooperatives) filed a joint application to intervene. The City of Springfield, Missouri, through the Board of Public Utilities (City

Utilities) filed its application to intervene on November 19, 1998. No other party requested permission to intervene. On December 3, 1998, the Commission issued an order granting the Cooperatives' and City Utilities' requests to intervene. The Commission established a procedural schedule by its order issued on January 13, 1999, and set August 2 and 3, 1999, as the dates for a hearing. On June 25, 1999, Empire, the Staff of the Public Service Commission (Staff) and the Cooperatives filed a Non-Uniform Stipulation and Agreement (Agreement). City Utilities and the Office of the Public Counsel (Public Counsel) did not join in the Agreement. On June 29, 1999, City Utilities filed a Request for Hearing and for Extension of Time to File Cross-Surrebuttal. City Utilities' motion indicated its opposition to the Agreement and requested additional time to prepare cross-surrebuttal in order to respond to the Agreement. On June 30, 1999, the Commission issued an Order Modifying Procedural Schedule that allowed the parties one additional week in which to file cross-surrebuttal testimony.

On July 15, 1999, the Staff, on behalf of all of the parties, filed a proposed list of issues. Each of the parties filed a statement of its respective positions regarding those issues on July 22, 1999. The matter proceeded to a hearing on the merits on August 2, 1999. Public Counsel appeared at the hearing and announced that it supported the Agreement. Testimony supporting and opposing Empire's application was admitted into evidence. The parties submitted initial briefs on September 15, 1999 and reply briefs on October 5, 1999.

At the hearing, the Commission had questions concerning the rates charged by the various utilities involved in this case. At the request of the Commission, on August 18, 1999, Staff submitted late-filed Exhibit No. 8, consisting of three pages entitled Residential Bill Comparison, Small Non-Residential Bill Comparison - Single-Phase Service, and Medium Non-Residential Bill Comparison - Three-Phase Service. On August 20, 1999, the Commission issued a Notice Regarding Late Filed Exhibit, which notified any party wishing to make an objection to the late-filed exhibit that it must do so no later than August 30. The notice also indicated that if no objections were filed, the late-filed exhibit would be admitted into evidence. No party filed any objections to late-filed Exhibit No. 8 and it will therefore be admitted into evidence.

Findings of Fact:

The Missouri Public Service Commission has considered all of the competent and substantial evidence upon the whole record in order to make the following findings of fact. The Commission has also considered the positions and arguments of all the parties in making these findings. Failure to specifically address a particular item offered into evidence or a position or argument made by a party does not indicate that the Commission has not considered it. Rather the omitted material was not dispositive of the issues before the Commission.

The Non-Unanimous Stipulation and Agreement:

In the Agreement, Empire agreed to seek certification in a substantially smaller geographic area. In return, Staff and the

Cooperatives agreed not to oppose Empire's certification to serve those more limited areas. Under terms of the Agreement, Empire is seeking certification in and around the cities of Willard, Republic and Strafford. The precise areas for which certification is sought are described in Appendix A to the Agreement.

City Utilities did not join in the stipulation and agreement and indeed strenuously opposed its provisions. Therefore, the Commission will consider the non-unanimous stipulation and agreement to be merely a change of position by the signatory parties from their original positions to the stipulated position. See. In the Matter of Missouri Public Service, 2 MPSC 3rd 221, 223 (1993). In this case, the effect of the Agreement is to amend Empire's application to change the areas in which it is seeking certification. The Agreement does not change Empire's obligation to meet the requirements imposed by statute and regulation to qualify for the certificates of convenience and necessity that it seeks.

The Commission need not, and will not, "approve" or "disapprove" the Agreement. In that regard, some of the parties have suggested that Empire and the other signatories to the Agreement have an obligation to present evidence to "support" the Agreement. In the context of this case, that suggestion is misleading. Section 393.170.3, RSMo 1994, provides that the Commission may grant a certificate of convenience and necessity if, after due hearing, it determines that "such construction or such exercise of the right, privilege or franchise is necessary or convenient for the public service." If the Commission finds that the

requirements of law have been satisfied, it will grant the requested certificates of convenience and necessity. If those requirements have not been met, then no certificates will be granted, no matter what some of the parties may have agreed upon in the non-unanimous stipulation and agreement.

Requirements for Certification:

Section 393.170.3, RSMo 1994, gives the Commission the authority to grant a utility the authority to operate an electric system in a given geographical area if it shall "after due hearing determine that such construction or such exercise of the right, privilege or franchise is necessary or convenient for the public service." The statute does not define "necessary or convenient", but that requirement has been refined when examined by the courts. The term "necessity" does not mean "essential" or "absolutely indispensable" but that an additional service would be an improvement justifying its cost. State ex rel. Beaufort Transfer Co. v. Clark, 504 S.W.2d 216, 219 (Mo. App. 1973). The state's primary interest in determining whether to grant a certificate is to protect the public rather than to protect a utility from competition. State ex rel. Public Water Supply Dist. No. 8 v. Public Service Commission, 600 S.W.2d 147, 155 (Mo. App. 1980).

In making a determination as to whether or not the statute has been satisfied and a certificate of convenience and necessity should be granted, the Commission has in prior cases considered the following standards:

1. There must be a need for the service;
2. The applicant must be qualified to provide the proposed service;
3. The applicant must have the financial ability to provide the service;
4. The applicant's proposal must be economically feasible; and
5. The service must promote the public interest.

In re. Ozark Natural Gas Company, 5 Mo. P.S.C. 3rd 143, 146 (1996). See also, In re. Tartan Energy Company, 3 Mo. P.S.C. 3rd 173, 177 (1994); In re. Intercon Gas, Inc., 30 Mo. P.S.C. (N.S.) 554, 561 (1991). Those five standards will be applied to each distinct area for which Empire seeks certification.

Consideration of the Standards:

Empire's application, as amended by the non-unanimous stipulation and agreement, requests that it be certificated to provide electric services in specified areas in and around the communities of Republic, Willard and Strafford. With regard to the areas in and around Republic, no party opposed Empire's request for certification. With regard to the cities of Willard and Strafford, no party opposed Empire's request for certification in the areas now within the city limits of those communities. However, City Utilities did oppose Empire's request to be certificated in areas outside the current city limits. Therefore, Empire's Application will be separately considered for each of three areas: First, the area near Strafford but outside the existing city

limits; Second, the area near Willard but outside the existing city limits; and Third, all other areas for which Empire seeks to be certificated.

1. There must be a need for the service

a. The area near Strafford but outside the existing city limits.

The evidence presented at the hearing indicates that Empire is currently the franchised supplier of electricity within the community of Strafford. Testimony also indicated that Strafford is expanding and that it has in the past, and may in the future, expand its city limits into areas for which Empire is not certificated to provide service. The future expansion of Strafford may create problems for Empire in that there could once again be areas of the city that it would not be certificated to serve. Empire requests that it be allowed to create a reasonable buffer zone around the city so that as Stafford expands into new areas, it will not be necessary to continually come back to the Commission to request piecemeal expansions of its service territory.

The future expansion of Strafford's city limits might create an additional problem if Empire's service area is not allowed to keep ahead of the expansion of the city. Strafford's population is expected to exceed 1,500 in the 2000 census. That means that Strafford will no longer be considered a rural area for purposes of section 394.080, RSMo 1994, the statutes that permits rural electric cooperatives to serve customers only in rural areas. Therefore, the electric cooperative that serves the area around Strafford would not be able to serve new customers in the areas annexed by Strafford. Similarly, City Utilities' ability

to serve new customers in areas annexed by Strafford would be limited by City Utilities' lack of a franchise from Strafford. Thus, the possibility exists that a customer located within a newly annexed area of Strafford, but outside the area within which Empire is certificated to serve, could not be lawfully served by any electric provider. Such a customer might be inconvenienced while Empire came before the Commission to seek an expansion of its service territory. For that reason it is reasonable and appropriate to allow Empire its requested buffer area around the current city limits of Strafford.

City Utilities argues that the requested expansion of Empire's service area is not needed because to allow Empire to expand into the area in question would create an inappropriate duplication of services. City Utilities and Southwest Electric Cooperative already have facilities within the area and City Utilities suggests that to permit Empire to also enter this area would create an unsightly and perhaps hazardous tangle of electric lines. The Commission certainly agrees that unnecessary duplication of facilities should be avoided. The Commission also believes that the safety of the public must always be considered when deciding whether or not to issue a certificate of service authority. However, some duplication of facilities already exists in this area. Allowing Empire to add additional facilities will not create any new or unique problems. On balance, the potential problems resulting from any additional duplication of facilities that might result from granting Empire its requested expansion of service territory are outweighed by the demonstrated need for that expansion. The Commission finds that there

is a need for Empire's services in an expanded service area near Strafford but outside the city limits.

b. The area near Willard but outside the existing city limits

Essentially the same arguments for and against granting Empire's request to expand its service area near Strafford also apply to its request to expand its service area near Willard. Again, only Empire holds a franchise from the municipality to serve its citizens. Therefore, there is the same need for Empire to be certificated to serve areas that may be incorporated within the city limits in the future. Furthermore, the risk of duplication of facilities in the area around Willard is reduced because City Utilities does not currently have any facilities in the area for which Empire seeks certification. The Commission finds that there is a need for Empire's services in an expanded service area near Willard but outside the city limits.

c. All other areas for which Empire seeks to be certificated.

No party opposed Empire's request for certification in the other areas specified in the stipulation and agreement. The evidence that was persuasive with regard to the areas around Strafford and Willard is equally persuasive with regard to the other areas. Indeed, for those areas that have already been incorporated into the municipal limits of Strafford, Willard and Republic, the need for Empire's certification is particularly evident. The Commission finds that there is a need for Empire's services in an expanded service area in all other areas specifically described in the stipulation and agreement.

2. The Applicant must be Qualified.

The area near Strafford but outside the existing city limits, the area near Willard but outside the existing city limits, and all other areas for which Empire seeks to be certificated.

Empire's qualification to manage and operate an electric system in the requested areas was unchallenged at the hearing. Empire has operated as an electric utility since 1909 and currently serves an area of approximately 10,000 square miles in Missouri, Kansas, Arkansas and Oklahoma. Empire's qualifications to expand its existing services into the relatively small additional areas for which it seeks certification are apparent. The Commission finds that Empire is qualified to provide the services for which it seeks certification.

3. The applicant must have the financial ability to provide the service.

The area near Strafford but outside the existing city limits, the area near Willard but outside the existing city limits, and all other areas for which Empire seeks to be certificated.

Empire's financial ability to provide the services for which it seeks certification were not challenged by any party. Empire is a well-established utility company and the evidence indicated that it would have no difficulty in financing its proposed expansion into the additional areas for which it seeks certification. The Commission finds that Empire has the financial ability to provide the services for which it seeks certification.

4. The applicant's proposal must be economically feasible.

The area near Strafford but outside the existing city limits, the area near Willard but outside the existing city limits, and all other areas for which Empire seeks to be certificated.

Before the Commission will grant a certificate of service authority to a utility, it must be shown that the utility's proposed service will be economically feasible. Empire did provide credible evidence regarding the construction costs and revenue expectations associated with the proposed expansion. City Utilities asserted that Empire's financial estimates were speculative and therefore, unreliable. City Utilities also pointed out that the financial estimates Empire set out in its original application did not change when it agreed to seek a greatly reduced area in the non-unanimous stipulation and agreement. City Utilities suggests that this is further indication that the financial estimates are unreliable.

Michael Palmer, Empire's witness, testified at the hearing that these financial estimates are indeed speculative. He asserted that any estimates must be speculative at this point because Empire does not currently have any customers in the areas for which it is seeking certification. He indicated that Empire would expand into newly certificated areas in a manner that was consistent with the tariffs it has filed with the Commission. Palmer also testified that the reduction of the area for which Empire was seeking certification would not significantly change Empire's financial estimates.

Empire presented a reasonable estimate of its construction costs and anticipated revenue and those estimates were not rebutted by any contrary evidence. Furthermore, it is important to keep in mind the Commission's purpose in requiring a showing of financial feasibility. A utility's customers and the public could be harmed if the utility jumped into a project that would be a financial drain on the company. In determining whether there is a financial risk, it is appropriate to examine the overall financial strength and stability of the company. See. In the Matter of the Application of UtiliCorp United, Inc., 3 Mo. P.S.C. 3d 127 (1994). In this case, Empire's possible expansion is a very small project for a rather large utility. Indeed, Empire estimated that costs for new construction in its expanded service area would be four-tenths of one percent of Empire's total budgeted and anticipated construction expenditures for the same time period. Clearly, the financial health and stability of Empire will not be put at risk by this project. Under these circumstances, the Commission finds that Empire has demonstrated that its proposed expansion is financially feasible.

5. The service must promote the public interest.

The area near Strafford but outside the existing city limits, the area near Willard but outside the existing city limits, and all other areas for which Empire seeks to be certificated.

Generally, a finding that a proposed service will promote the public interest will follow from a finding that the first four standards have been satisfied. In the Matter of the Application of Tartan Energy Company, 3 Mo. P.S.C. 3d 173, 189 (1994). That is true in this case.

Empire has successfully demonstrated the need for an expanded service area and it has demonstrated that it is qualified to serve the area and has the financial ability to do so. Finally it has established that it is financially feasible for it to provide services in the expanded area. The Commission finds that granting Empire's request for an expanded service area will promote the public interest.

The Requirements of 4 CSR 240-2.060(2)(F):

City Utilities asserts that the Commission should reject Empire's application because Empire has allegedly failed to comply with the requirements of 4 CSR 240-2.060(2)(F). That regulation requires that an application for certificate of service authority must contain, among other requirements, a list of ten persons residing in the area to be served, and a feasibility study containing plans and specifications and estimated costs, plans of financing, proposed rates and charges and estimates of numbers of customers, revenues and expenses. Empire's original application contained all the required information. However, Empire did not present a revised list of residents or a revised feasibility study following the filing of the non-unanimous stipulation and agreement. Therefore, City Utilities suggests that the Commission is precluded by its own rule from granting Empire the disputed new territory. City Utilities misunderstands the requirements of the Commission's regulation.

4 CSR 240-2.060(2)(F) requires that certain information be included in any application for a certificate of convenience and

necessity for a service area. This requirement is in place so that the Commission's Staff and other potentially interested entities will be able to effectively examine and evaluate the application. There is nothing in the regulation that would require an applicant to resubmit the required information when it enters into a stipulation and agreement. Empire is, of course required to produce evidence to satisfy the Commission's requirements for certification. As previously indicated, Empire has done so. Any failure to update its application will not prevent the Commission from granting Empire's application.

Conclusions of Law:

The Missouri Public Service Commission has reached the following conclusions of law:

1. The Empire District Electric Company is duly incorporated under the laws of the state of Kansas and is qualified to do business as a foreign corporation in Missouri.

2. The Empire District Electric Company is subject to the jurisdiction of the Public Service Commission as provided by Section 386.250, RSMo Supp. 1998, and Chapter 393, RSMo.

3. Section 393.170.1, RSMo 1994, provides in relevant part that "No...electrical corporation,...shall begin construction of a...electric plant...without first having obtained the permission and approval of the commission".

4. Section 393.170.2, RSMo 1994, provides in relevant part that "The commission shall have the power to grant the permission and approval

herein specified whenever it shall after due hearing determine that such construction or such exercise of the right, privilege or franchise is necessary or convenient for the public service."

Based upon the Commission's review of the applicable law, Empire's Application as modified by the non-unanimous stipulation and agreement, and its findings of fact, the Commission concludes that Empire's Application should be granted.

IT IS THEREFORE ORDERED:

1. That The Empire District Electric Company's Application, as modified by the Non-unanimous Stipulation and Agreement filed on June 25, 1999, is approved.

2. That The Empire District Electric Company is granted a certificate of public convenience and necessity to construct, install, own, operate, control, manage, and maintain a system for the provision of electric service to the public pursuant to its approved rates, rules and regulations in the areas of Greene County, Missouri, as described in Appendix A to the non-unanimous stipulation filed on June 25, 1999. A copy of Appendix A is attached to this Report and Order.

3. That late-filed Exhibit No. 8 is admitted into evidence.

4. That any motions not previously ruled upon are hereby denied.

5. That this Report and Order shall become effective on December 17, 1999.

BY THE COMMISSION

A handwritten signature in black ink, reading "Dale Hardy Roberts". The signature is written in a cursive, slightly slanted style.

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge

(S E A L)

Lumpe, Ch., Crumpton, Schemenauer,
and Drainer, CC., concur and certify
compliance with the provisions of
Section 536.080, RSMo 1994.
Murray, C., dissents with opinion

Dated at Jefferson City, Missouri,
on the 7th day of December, 1999.

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Case No. EA-99-172

DISSENTING OPINION OF COMMISSIONER CONNIE MURRAY

I respectfully dissent. I would grant Empire District Electric Company authority to serve the additional area it requests in and around Republic, as well as the additional areas it requests within the current city limits of Willard and Strafford. Based upon the evidence, I would not at this time grant authority to serve the additional areas outside the city limits of Willard and Strafford.

Respectfully submitted,


Connie Murray, Commissioner

Dated at Jefferson City, Missouri,
on this 7th day of December, 1999.

APPENDIX A
TO NON-UNANIMOUS STIPULATION
OF JUNE 25, 1999 IN CASE NO. EA-99-172

1. Legal description of area depicted on map of territory in vicinity of Willard, Missouri
2. Legal description of area depicted on map of territory in vicinity of Republic, Missouri
3. Legal description of area depicted on map of territory in vicinity of Strafford, Missouri
4. Map of territory in vicinity of Willard, Missouri
5. Map of territory in vicinity of Republic, Missouri
6. Map of territory in vicinity of Strafford, Missouri

Willard

The land area described below forms an extension of The Empire District Electric Company's (Company) service area contiguous to Company's existing service area in and around the City of Willard, Missouri. The described area lies within and encompasses parts of Township 30 North, Range 22 West, Sections 29,30, and 32, all in Greene County, Missouri.

Beginning at the SE corner of Section 29, thence North along the East Line of Section 29 a distance of 2640 feet to the NE corner of the South Half of Section 29; thence West along the North Line of the South Half of Section 29 a distance of 5280 feet to the NE corner of the South Half of Section 30; thence West along the North Line of the South Half of said Section 30 a distance of 3960 feet to the NW corner of the NE $\frac{1}{4}$ of the SW $\frac{1}{4}$ of said Section 30; thence South along the West Line of said NE $\frac{1}{4}$ of the SW $\frac{1}{4}$ a distance of 1320 feet to the NW corner of the SE $\frac{1}{4}$ of the SW $\frac{1}{4}$ of Section 30; thence East along the North Line of the SE $\frac{1}{4}$ of the SW $\frac{1}{4}$ of Section 30 a distance of 1320 feet; thence South along the East line of said SE $\frac{1}{4}$ of the SW $\frac{1}{4}$ a distance of 1320 feet; thence East along the South Line of Section 30 a distance of 2640 feet to the SW corner of Section 29; thence continuing East along the South Line of Section 29 a distance of 2640 feet; thence South along the West Line of the NW $\frac{1}{4}$ of the NE $\frac{1}{4}$ of Section 32 a distance of 1320 feet; thence East along the South Line of the North Half of the NW $\frac{1}{4}$ of Section 32 a distance of 2640 feet; thence North along the East Line of said Section 32 a distance of 1320 feet to the Point of Beginning.

Map References

88-08-09 Township 30 North, Range 22 West, Greene County, Missouri

Republic

The land area described below forms an extension of The Empire District Electric Company's (Company) service area contiguous to Company's existing service area in and around the City of Republic. The described area lies within and encompasses parts of Sections 2, 3, 4, 10, 11, and 14 of Township 28 North, Range 23 West, all in Greene County, Missouri.

Beginning at the SW corner of the SE $\frac{1}{4}$ of Section 14 of Township 28 North, Range 23 West; thence East along the South Line of said Section 14 a distance of 2640 feet to the SE corner of Section 14; thence north along the East line of Sections 14, 11, and 2 a distance of 15,840 feet to the NE corner of Section 2; thence West along the North Line of Sections 2, 3, and 4 a distance of 15,840 feet to the NW corner of Section 4; thence South along the West Line of Section 4 a distance of 5,280 feet to the SW corner of Section 4; thence East along the South Line of Section 4 a distance of 5,280 feet to the NW corner of Section 10, thence South along the West Line of Section 10 a distance of 5,280 feet to the SW corner of Section 10; thence East along the South Line of Section 10 a distance of 5,280 feet, to the SW corner of Section 11; thence East along the South Line of Section 11 a distance of 2640 feet; thence South along the West Line of the East Half of Section 14 a distance of 5,280 feet, to the Point of Beginning.

Greene County Map References:

88-17-01 Twp 28, R 23

88-17-02 Twp 28, R 23

88-17-06 Twp 28, R 23

Strafford

The land area described below forms an extension of The Empire District Electric Company's (Company) service area contiguous to Company's existing service area in and around the City of Strafford. The described area lies within and encompasses parts of Sections 4, 5, and 6 of Township 29 North, Range 20 and Section 1 of Township 29 North, Range 21 West, in Greene County, Missouri.

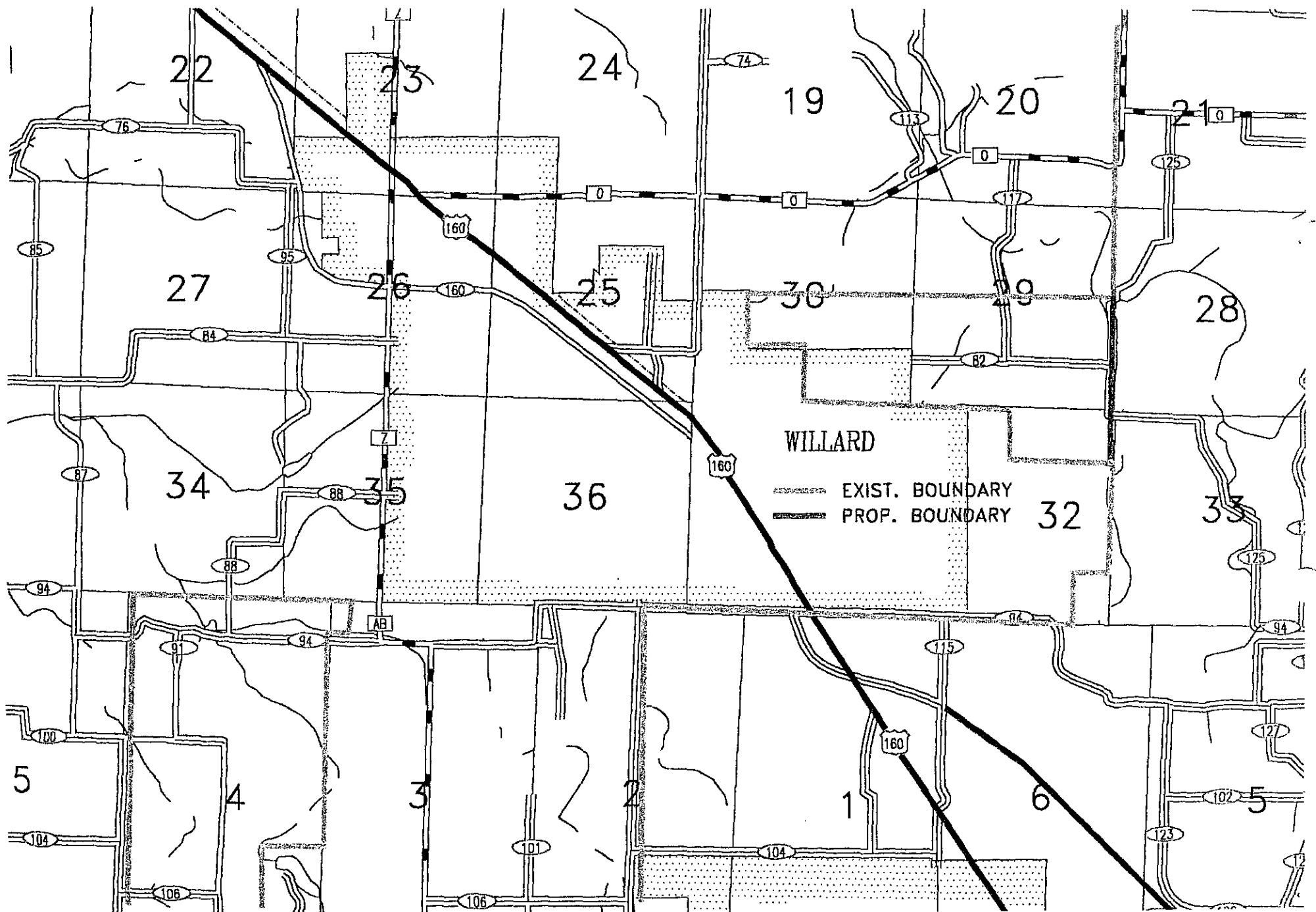
Commencing at the SE corner of Section 4 of Township 29 North, Range 20 West; thence North along the East line of said Section 4 a distance of 4040 feet, more or less, to Government Lot Line No. 2 (GL-2); thence West along said GL-2 a distance of 2640 feet, more or less, to a point on the West line of the East Half of said Section 4 for the Point of Beginning; thence continuing West along said GL-2 a distance of 13300 feet, more or less, to a point on said GL-2 in Section 1 of Township 29 North, Range 21 West, 100 feet west of the East Line of said Section 1; thence North, parallel to the East Line of said Section 1, 5340 feet, more or less, to Government Lot Line No. 6 (GL-6); thence East along said GL-6 a distance of 13300 feet, more or less, to the West line of the East Half of Section 4, Township 29 North, Range 20 West; thence South along the West line of the East Half of said Section 4 a distance of 5340 feet, more or less, to the Point of Beginning.

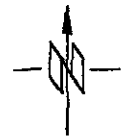
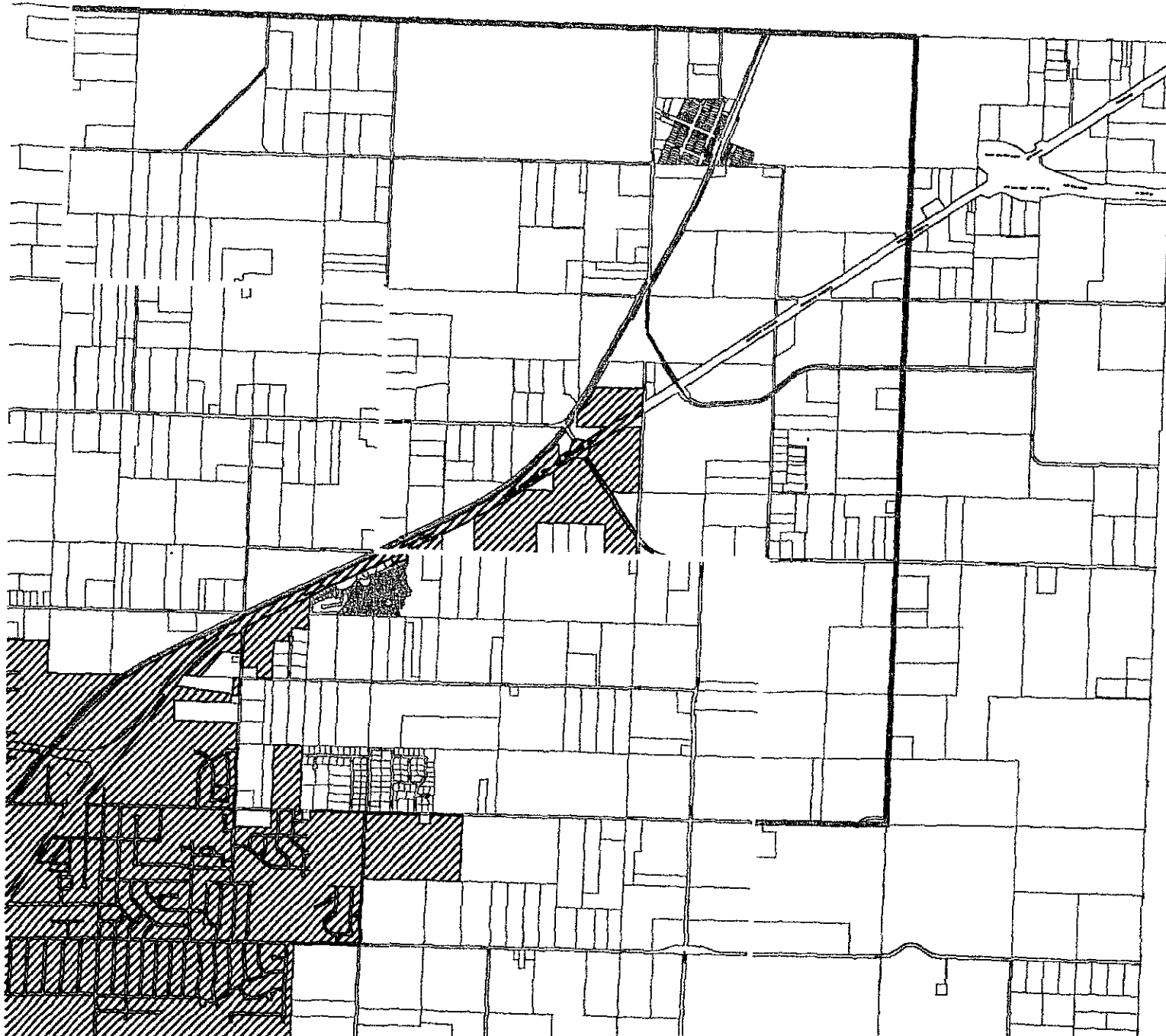
Greene County Map References:

88-11-05 Twp 29, R 20, Map Sheet 4

88-11-04 Twp 29, R 20, Map Sheets 5 & 6

88-11-06 Twp 29, R 21, Map Sheet 1





CITY OF REPUBLIC
6/17/99 JEB

EXIST. BOUNDARY

 PROPOSED
BOUNDARY

