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Phone 573.335.1680
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SMITH & CO. ENGINEERS

June 28, 2006

FILED
JUN 29 2006
Missouri Public
Service Commission

Missouri Public Service Commission
Ms. Cully Dale – Secretary of Commission
P.O Box 360
Jefferson City, Missouri 65102

**Re: Electric Utility Service Transfer
East Main Street – Jackson, MO
Smith&Co. Project No. 605304**

Dear Secretary of Commission,

I represent the engineering firm of Smith & Co. Our company has contracted with the City of Jackson, Missouri for design and construction phase services of East Main Street Extension. The design has been completed and a contractor has begun work on the project. During the location and identification of utilities by the contractor it became apparent that Ameren Electric maintains a service through the project site to service one customer south and two customers north of the project, although the majority of residents in the area are serviced by the City of Jackson Utilities Department.

An on-site meeting was coordinated on June 8, 2006 with the contractor, Smith & Co, Ameren UE and the Jackson Electrical Services Department. During this meeting I became aware that this service was a concern to both electrical service providers. The two companies share power poles and cross over each other's power lines in several locations. In the event of power outages or lines being knocked down on one provider's services lines; that provider's employees will be working on a de-energized system on the same pole as an energized system and there becomes the risk of lines crossing over with the other providers service. When we left the meeting I took the responsibility of meeting with three customers and coordinating a transfer of service from AmerenUE to Jackson Electrical Services Department, if the customers were agreeable to the transfer.

I contacted Mr. Allen Bax with your organization and he has guided me through the requirements and process of transferring electrical services. After meetings with all of the property owners and explaining the situation that exists, they have agreed to transfer services. Attached is a copy of the Application for Change of Electric Service Provider for each of the three property owners. Mr. Bax also suggested that we provide a map and pictures of the site to

June 28, 2006

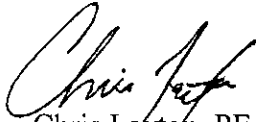
Page 2

give the Public Service commission a better understanding of the situation. Those documents are also included in this package.

If you have any questions, please contact me at 573-335-1680.

Sincerely,

SMITH & CO.
ENGINEERS



Chris Layton, PE
Project Manager

Enclosures/Attachments

Public Service Commission Applications
Map of Site
Pictures of Site

By USPS Overnight Service

cc: w/o Attachments
Mr. Dave Goehring, AmerenUE Customer Services Representative
Mr. Rodney Bollinger, City of Jackson Public Works Director
Mr. Steve Jones, Property Owner
Mr. Cleutus Uhrhan, Property Owner
Mr. Greg Withers, Property Owner

FILED

JUN 29 2006

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the matter of the application of)
)
Greg Withers) Case No. _____
(Name of Applicant))
)
for change of electric supplier.)

APPLICATION FOR CHANGE OF ELECTRIC SERVICE PROVIDER

1. Applicant's address is: 430 Oak Hill Rd. Jackson, MO 63755

2. The name of Applicant's current electric service provider is: Ameren UE

3. Applicant requests the Missouri Public Service Commission to order a change of electric supplier to the address indicated above.

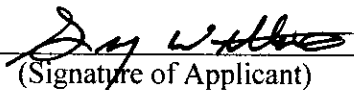
4. Applicant requested the Commission to order a change of electric supplier from Ameren UE 400 Broadway St. Cape Girardeau, MO 63701
(Current)
to Jackson Electric Distribution Dept. Florence St. Jackson, MO 63755
(Requested)

5. Applicant requests the Missouri Public Service Commission to order a change of electric provider for the following reasons. *The Ameren UE service line which supplies power to our property is surrounded by Jackson Electric Distribution Department service lines. The city is in the construction of a road project, East Main Street Extension, which will require lines to be relocated. The Engineer on the road project approached me about the reasons for transferring service from a technical standpoint. Transferring service will help the city and the project being constructed and will not adversely affect me.

6. Applicant has taken the following steps in an attempt to work out electric service problems with the electric service provider: N/A

WHEREFORE, Applicant requests the Missouri Public Service Commission to issue an Order which changes the current electric service provider.

6-27-06
(Date)


(Signature of Applicant)

503-204-0707
(Phone Number)

*If reason for change is poor service, outages, low voltage, etc., applicant should submit a record of service problems covering at least 90 days, including dates and times of problems to the extent possible. Applicant should also attempt to determine reasons for any service problems. For instance, if electric service was out or you are experiencing blinking lights, you should contact the supplier of electric service to determine the problem, and include this information with the application. (If the reasons from the supplier was a storm, car hitting pole, trees in line, conductor fell down, or whatever the supplier states for the problem, this should be noted.)

STATE OF MISSOURI

COUNTY OF Cape Girardeau

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)
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ss.

VERIFICATION

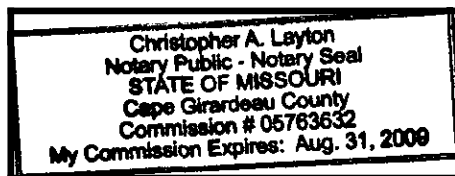
Greg Withers, on oath, states that he/she has read the foregoing application and is familiar with its contents and the matters set forth therein are true to the best of his/her knowledge, information and belief.

Greg Withers
(Signature of Applicant)

SWORN TO BEFORE ME, the undersigned Notary Public on this the JUNE 27TH
day of JUNE 2006
+9.

Christopher A. Layton
Notary Public

My Commission Expires: 8/31/2009



**INFORMATION ON PUBLIC SERVICE COMMISSION PROCEDURE
FOR *PRO SE* CHANGE OF SUPPLIER APPLICANTS**

Pro se applicants are applicants who choose to represent themselves before the Public Service Commission rather than being represented by an attorney. This attachment is intended to give *pro se* applicants information on Commission procedures for applicants for a change of electric supplier. However, it is still the responsibility of *pro se* applicants to educate themselves about Commission procedures. "Parties who represent themselves must satisfy all relevant rules of procedure; they are entitled to no indulgence they would not have received if represented by counsel." *Sutton v. Kestler*, 930 S.W.2d 516, 517 (Mo. App. 1996). Enclosed please find a copy of the Commission's rules on Practice and Procedures. You will be expected to follow these rules.

Generally, there will be five parties in a change of supplier case: (1) the applicant; (2) the applicant's current electric supplier; (3) the electric supplier to whom the applicant wishes to change; (4) the Staff of the Commission; and (5) a representative of the Office of the Public Counsel. The Staff of the Commission is a separate party and will make an independent recommendation to the Commissioners. However, the Commissioners will make the ultimate decision. The Office of the Public Counsel represents the general public before the Commission. Neither the Staff of the Commission nor the Office of the Public Counsel represents the applicant, and neither will act as applicant's attorney nor give substantive advice to the applicant. The Office of the Public Counsel and Staff will try to answer any questions an applicant may have about Commission procedure. The applicant should also be aware that if any pleading or

correspondence is to be filed with the Commission, a copy of that document must be sent to all the other parties.

Other parties may request information from the applicant through the Commission discovery procedure, which is similar to what is allowed in court cases. The purpose of discovery is to find out generally what evidence a party intends to present at a hearing, or what a party's witnesses may be expected to testify at a hearing. All parties, including the *pro se* applicant, may engage in discovery, in accordance with the Commission's rules.

If there are contested matters, the Commission will hold a hearing.

At the hearing, the *pro se* applicant can expect the following procedure: Each party will be allowed to make a brief opening statement. Then the applicant will present evidence. If applicants expect to take the stand to testify on their own behalf, they will have to testify in narrative form, since there will be no attorney to ask them questions. If the applicant intends to put a witness on the stand, applicant will have to ask nonleading, direct examination questions to elicit the witness's testimony.

All witnesses will be asked to give an oath or affirmation, and any witness may be questioned by the Commissioners or the Administrative Law Judge. All witnesses are subject to cross-examination by the other parties. All witnesses should have personal knowledge of the subject of their testimony. Applicants should bring to the hearing at least thirteen copies of any exhibit or document they intend to offer into evidence.

After the applicant has presented evidence, the other parties will be allowed to present their evidence. Then the parties will give their closing statements. Sometimes the Commission wishes to have briefs instead of closing statement. This is unlikely in the

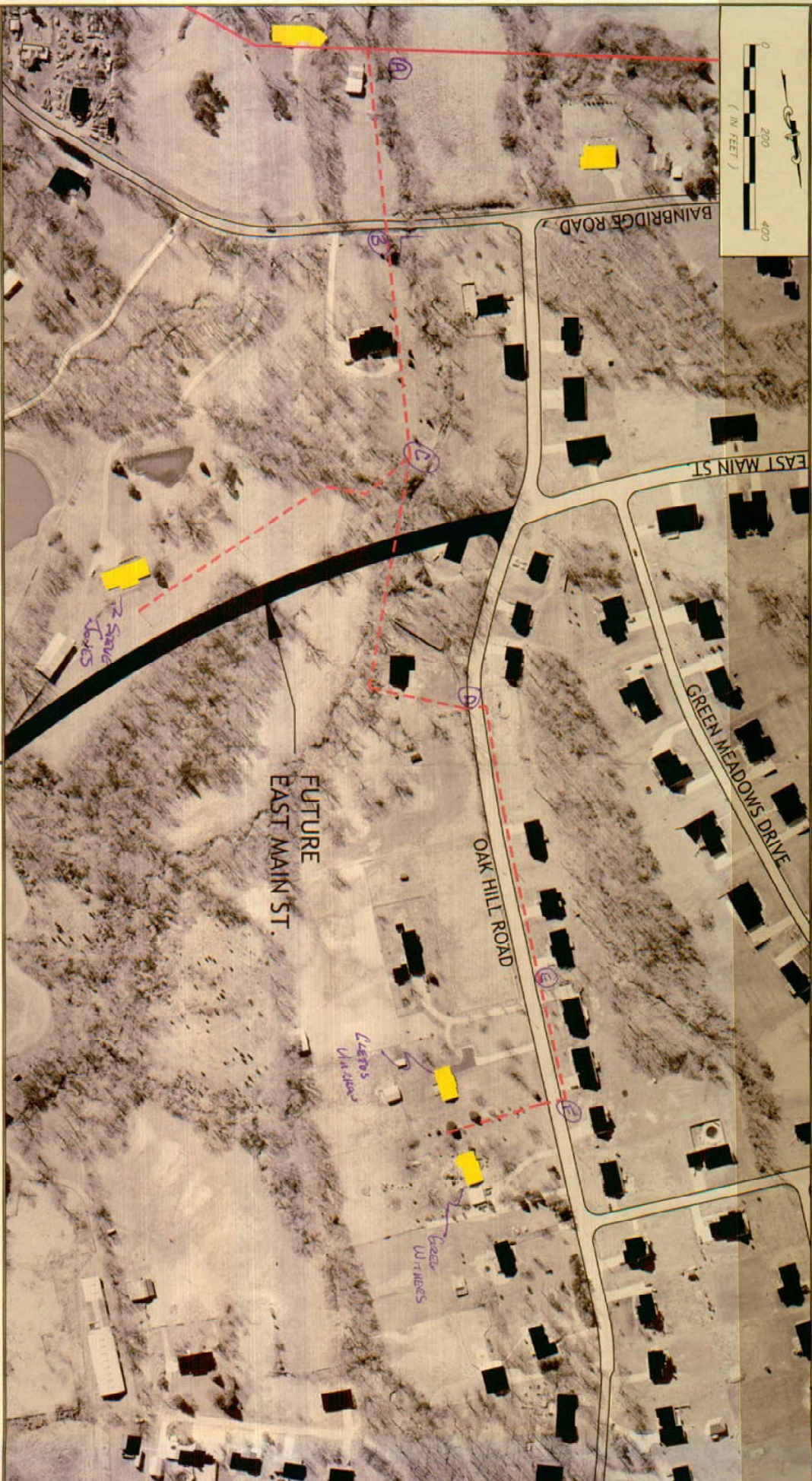
typical change of supplier case, but if briefs are requested the procedure will be explained at the time of the hearing.

In applications for change of electric suppliers, the Commission considers a number of factors in making its decision, including, but not limited to the following:

1. Whether the customer's needs can be adequately met by the present supplier with respect to either the amount or quality of the power;
2. Whether there are health or safety issues involving the amount or quality of power;
3. What alternatives the customer has considered, including alternatives with the present supplier;
4. Whether the customer's equipment has been damaged or destroyed as a result of a problem with the electric supply;
5. The effect the loss of the customer would have on the present supplier;
6. Whether a change in supplier would result in a duplication of service or facilities, especially in comparison with alternatives available from the present supplier, a comparison which could include: (a) the distance involved and cost of any new extension, including the burden on others -- for example, the need to procure private property easements; and (b) the burden on the customer relating to the cost or time involved, not including the cost of the electricity itself;
7. The overall burden on the customer caused by the inadequate service, including any economic burden not related to the cost of the electricity itself, and any burden not considered with respect to factor 6(b) above;

8. What efforts have been made by the present supplier to solve or mitigate the problem;
9. The impact the Commission's decision may have on economic development, on an individual or cumulative basis; and
10. The effect the granting of authority for a change of suppliers might have on any territorial agreements between the two suppliers in question, or on the negotiation of territorial agreements between the suppliers.

The applicant should try to address these factors when presenting testimony at the hearing.



GENERAL LEGEND

- AMEREN SERVICE LINE
- AMEREN SERVICE LINE TO BE ABANDONED
- JACKSON UTILITY DEPARTMENT CUSTOMERS
- AMEREN UTILITY CUSTOMERS

SMITH & CO. ENGINEERS
 1021 KINGSWAY DRIVE, SUITE 2
 CAPE GIRARDEAU, MISSOURI 63701
 (573) 335-1680
 FAX: (573) 335-8164



06/28/2006

From BUNBRIDGE ROAD Looking to (A)



06/28/2006

Andeen
9

Jackson UTILITIES

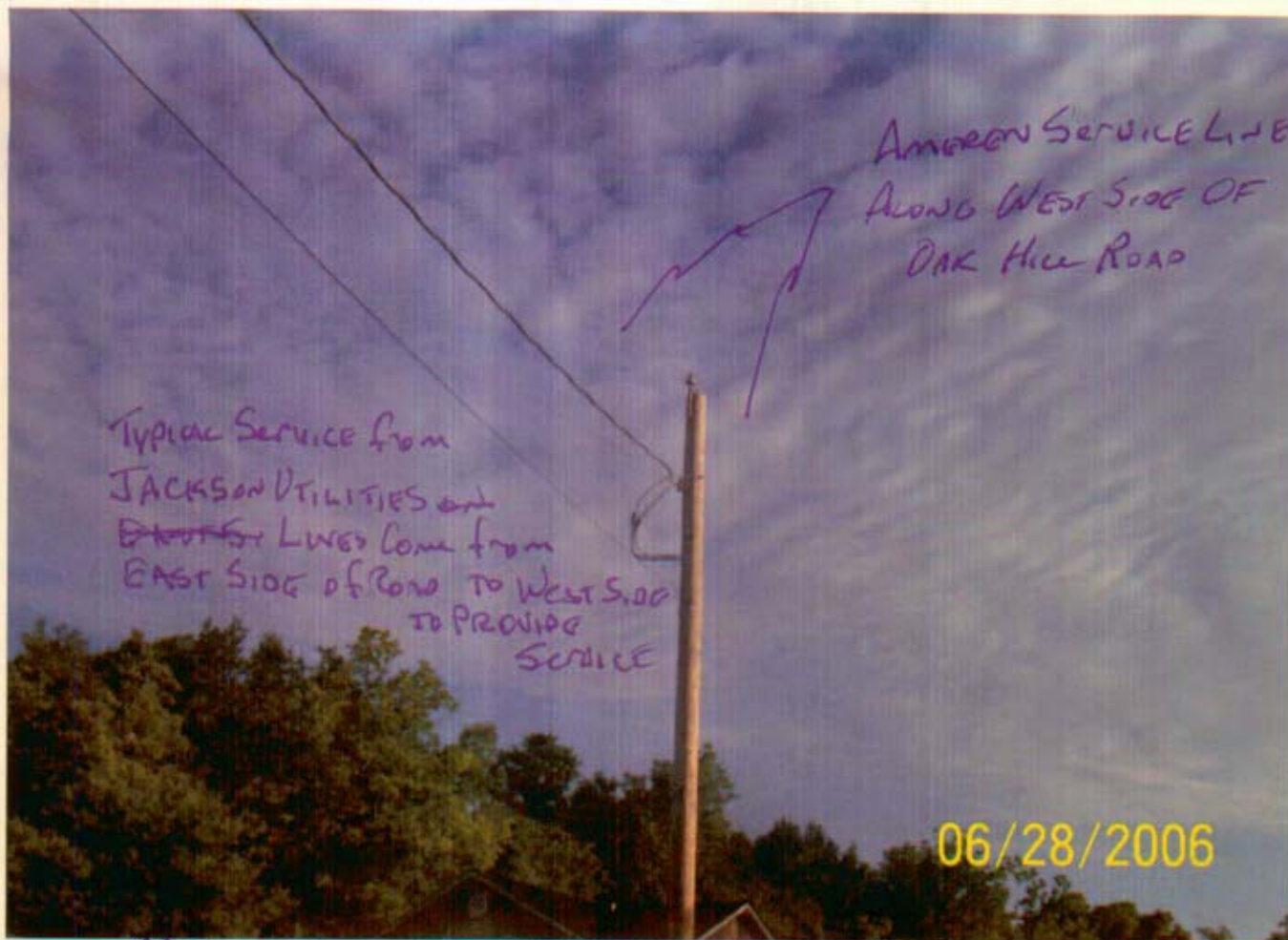
Jackson

Opp. 1 @ 3
Lombard St. W.



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(E) Typical Service Along West Side of Oak Hill



(F)