

BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF)	
MATT MYLOTT FOR CHANGE OF ELECTRIC)	
SUPPLIER FROM THE EMPIRE DISTRICT)	File EO-2018-0118
ELECTRIC COMPANY TO WHITE RIVER)	
VALLEY ELECTRIC COOPERATIVE, INC.)	

**WHITE RIVER VALLEY ELECTRIC COOPERATIVE, INC.'S
RESPONSE TO THE APPLICATION FOR CHANGE OF ELECTRIC
SERVICE PROVIDER**

COMES NOW White River Valley Electric Cooperative ("White River"), by and through its counsel undersigned, and for its response to the Application for Change of Electric Service Supplier filed in this cause, hereby states as follows:

1. This case was initiated by White River's existing member, Matt Mylott, on November 2, 2017 upon the filing of his Application for Change of Electric Service Provider (the "Application").
2. In the Application, Mr. Mylott is seeking approval to have White River serve all of his structures located at 20577 State Highway 413, Reeds Spring, Missouri 65737 (the "Property").
3. Mr. Mylott's property is currently served by both The Empire District Electric Company ("Empire") and White River.
4. Presently, Mr. Mylott's property has three (3) structures, two of which are served by White River and the other served by Empire.
5. Mr. Mylott desires three-phase power for all his structures and also desires one electric service provider instead of two for safety, clarity and reduction of total meters on his Property.

6. On November 6, 2017, the Commission entered its Order directing the Data Center to send notice of the Application to Empire and White River, and joining Empire and White River as parties to this proceeding.

7. Both White River and Empire were ordered to file responses to the Application, and the Commission Staff was requested to provide its recommendation on the Application to the Commission.

8. On November 27, 2017, Commission Staff, through Mark Johnson, submitted two (2) separate data requests to White River in this matter with a response deadline of December 17, 2017. Because December 17 was a Sunday, White River's Response was electronically filed on the morning of December 18, 2017 to both Data Requests.

9. White River's responses to the Data Requests provided Commission Staff with detailed information relating to the service history, installation of electric lines, equipment and facilities, and applicable structures relevant to the Application. The information contained within White River's submission for each Data Request is hereby incorporated with this Response by reference.

10. White River has completed the installation of three-phase electric service for the structures that it currently serves on Mr. Mylott's Property. Underground electric lines have been constructed and installed reducing the number of Mr. Mylott's meters. Now he receives one bill for all his electric service supplied by White River.

11. Mr. Mylott still receives service from Empire for one of his structures on the Property.

12. On December 6, 2017, Commission Staff filed a status report and stated that it believed it could formulate a recommendation for the Commission no later than January 20, 2018, possibly earlier, once it completed review of White River's and Empire's responses to the Data Requests.

13. Now that White River's three-phase service has commenced on the Property, it would be prudent for White River to install three-phase power to the remaining structure (presently served by Empire). This will timely and economically fulfill Mr. Mylott's request to have a single electric service provider that provides three-phase power to all structures on his Property.

14. On December 20, 2017, counsel for White River sent communication to counsel for Empire requesting a copy of Empire's Responses to Staff's Data Requests and also inquired whether White River could serve Mr. Mylott's remaining structure with three-phase or if this service would be objectionable to Empire, but as of the filing of this Response, no confirmation has been received regarding that request.

15. Accordingly, based on the historical and existing service now supplied to Mr. Mylott by White River, and because this change in electric service supplier is in the public interest for a reason other than rate differential, White River requests this Commission to approve the Application, thereby allowing White River to extend three-phase service to Mr. Mylott's remaining building on his Property, so White River will be the sole electric service supplier for Mr. Mylott in accord with his request contained within the Application.

WHEREFORE, above considered, White River Valley Electric Cooperative, Inc. hereby respectfully requests this Commission to grant the relief requested by the

Applicant for Change of Electric Service Provider, finding by Order that this change is in the public interest for a reason other than rate differential, thereby allowing White River to be the sole electric service provider for all buildings and structures on the Applicant's Property and for such further orders and relief the Commission deems just and appropriate under the premises.

Respectfully submitted,

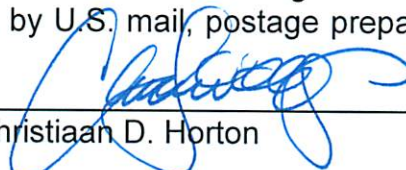
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By 
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CERTIFICATE OF SERVICE

27 I hereby certify that the above and foregoing document was filed in EFIS on this day of December, 2017, with notice of the same being sent to all counsel of record. A copy of this entry was also sent by U.S. mail, postage prepaid, to the pro se applicant.


Christiaan D. Horton