

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

**IN THE MATTER OF THE APPLICATION OF BLODGETT PAINT BALL & FUN
FACTORY, LLC, FOR THE CHANGE OF ELECTRIC SUPPLIER**

MISSOURI PUBLIC SERVICE COMMISSION

REGULATORY REVIEW DIVISION

DIRECT TESTIMONY OF DAVID RUSSELL

SUPPLIER REQUEST FOR BLODGETT PAINT BALL & FUN FACTORY, LLC

FILE NO. EO-2021-0163

Jefferson City, Missouri

April 2021

**DIRECT TESTIMONY ON BEHALF OF BLODGETT PAINT BALL & FUN
FACTORY, LLC**

DIRECT TESTIMONY OF DAVID RUSSELL

Q. Can you state your name and occupation?

A. My name is David Russell and I am the owner of Tank Tech, Inc. located in Blodgett, Missouri. My wife and I also own rental property and our personal residence in Blodgett, Missouri. My wife and I also operate Blodgett Paint Ball & Fun Factory as well.

Q. Are you familiar with the electric services that have been provided to Blodgett Paint Ball & Fun Factory in the past?

A. Yes, most of the maintenance and operational matters that pertain to Blodgett Paint Ball & Fun Factory, including electrical services, are mainly overseen by me. My wife runs the operation of facilitating events, including booking those events, and ensuring that Blodgett Paint Ball & Fun Factory is staffed when we have children's parties, events, and when the cabins that we built are used by an organization or for some event, such as a church camp.

Q. Right now, is Blodgett Paint Ball & Fun Factory being provided any electric service?

A. No. Due to a very limited income for Blodgett Paint Ball & Fun Factory, we could not continue to justify the expenses associated with providing electrical services from Semo Electric Co-Op and we had other issues with timely service and addressing any electric problems that we had at that location.

Q. Are you other companies and residence serviced by an electric provider?

A. Yes. all of our properties in Blodgett, Missouri are serviced by Union Electric Company as I understand it d/b/a Ameren Missouri.

Q. You have testified that Ameren Missouri provides electric services to all of your other properties including your residence. Can you be more specific about what electric services are provided by Ameren in Blodgett for you and your benefit?

A. Tank Tech, Inc., is owned by me and is serviced by Ameren Missouri, there is a main building where our office and operations exist. This is a building that is next to our primary residence in Blodgett, Missouri where my wife and I live. We also have another building that is serviced by Ameren where most of our materials are stored. Our primary residence is located close to the paint ball operation and is in fact is within walking distance of the paint ball operation and is also served by Ameren Missouri. We have several rental properties located within Blodgett that are also served by Ameren Missouri. As I understand it, all of Ameren Missouri's facilities and what they provide are all in close proximity to all of our properties in Blodgett, Missouri, including Blodgett Paint Ball & Fun Factory.

Q. Are you familiar with all of the operations that your wife has at the Blodgett Paint Ball & Fun Factory?

A. Yes, Margaret and I are very close knit when it comes to operating our business and that Blodgett Paint Ball & Fun Factory operation. Margaret wanted something for the kids and for the community so we started the Blodgett Paint Ball & Fun Factory operation. Our son, who is now an adult, had business operations and a small business within Blodgett Paint Ball & Fun Factory for many years and worked closely with my wife. This is a weekend, part-time, operation and when my wife hosts church camps, organization events and for churches and religious organizations, we were able to provide short-term housing in the cabins we built that are also located on the property.

Q. Is there money to provide all of the housing and benefits of the Blodgett Paint Ball & Fun Factory including utility services such as electric?

A. This business is not a what I would say a profit business because all of the funds that are gained by Blodgett Paint Ball & Fun Factory are then used to improve the property and have been used to improve the property for the cabins to benefit local organizations. The cabins were built with personal funds of Margaret and I because we wanted to not only give to the community but serve the public in any way that we could to provide a facility for church organizations and others to host events and have a place to stay in Blodgett. Blodgett does not have a hotel or short-term rental properties for people to stay in Blodgett.

Q. Do you believe that it is in the public's interests for you to continue to have the Blodgett Paint Ball & Fun Factory operation and also the incidental cabins for the use of these organizations as you have testified to?

A. Absolutely, Margaret and I are able to serve the public and provide a way for people to come and enjoy themselves not only locally but traveling through the area by providing a safe environment for kids and teenagers to play games, host birthday parties, play paint ball and laser tag when there really isn't anything else in the direct area for kids and teenagers. We host family events and the grounds where we are able to provide housing for organizations and to host church camps absolutely serves the public.

Q. If Union Electric Company d/b/a Ameren Missouri is not able to provide this service or your request for a change of service provider is not granted, and Semo Electric Co-Op remains the servicing provider for electric services do you believe that Blodgett Paint Ball & Fun Factory and the incidental camp grounds that you have described will be able to continue?

A. I'm not sure that we will be able to continue efficiently and economically to provide what we do now. The added cost and burden of staying with Semo Electric Co-Op is simply not financially feasible for Blodgett Paint Ball & Fun Factory. In order to continue to provide the public services that we do and to benefit our community and the surrounding areas and local churches, we will have to continue to put our own money into the business or simply not be able to conduct it. It is not financially feasible for our small company to continue to operate and have the added expense of how Semo Electric Co-Op bills. It appears Blodgett Paint Ball & Fun Factory is billed similarly to others who are probably full time businesses or using electric services on a day to day basis, which is not the case for Blodgett Paint Ball & Fun Factory. As I understand it, my wife's small business is being billed similar to industries, which Blodgett Paint Ball is not.

Q. And, Mr. Russell, do you believe that it is in the best interest of not only Blodgett Paint Ball & Fun Factory, but also the public for Semo Electric Co-Op to no longer be the service or supplier for electric services to Blodgett Paint Ball & Fun Factories properties and for the commission to allow Union Electric Company d/b/a Ameren Missouri to serve this particular property and business?

A. Absolutely. I believe it is in not only Blodgett Paint Ball & Fun Factory's best interest but for the public and local organizations that are served by my wife and I's efforts as I have testified to.

Q. Do you believe Ameren Missouri will provide better services and at better rates for your wife to continue providing a public benefit in the community of Blodgett?

A. Yes. Ameren bills for actual usage, not on a shared basis. With Ameren Missouri, we will be able to count on response to our issues, if there are any, and with the savings, more improvements will be made to benefit our community and local organizations – all to the public good.

Q. I have no further questions.

David Russell on his oath declares that he is of sound mind and lawful age; that he contributed to his direct testimony; and the his direct testimony is true and correct to the best of his knowledge and belief.



David Russell

State of Missouri

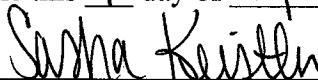
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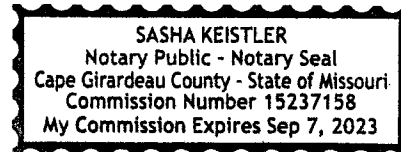
County of Cape Girardeau

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Subscribed and sworn to before me this 9th day of April, 2021.



Notary Public



JOHNSON, SCHNEIDER & FERRELL, L.L.C.

By: /s/ John R. Schneider
John R. Schneider No. 54194
212 North Main Street
Cape Girardeau, MO 63701
Telephone: 573-335-3300
Facsimile: 573-335-1978
Attorney for Applicant
Blodgett Paint Ball & Fun Factory, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document, *Direct Testimony of David Russell*, was served via e-mail on all counsel of record this 9th day of April, 2021.

/s/ John R. Schneider