

Exhibit No. \_\_\_\_\_  
Issues: Merits of Application  
Witness: Jon Schulte  
Type of Exhibit: Direct Testimony  
Sponsoring Party: Co-Mo  
Electric Cooperative  
Case No.: EO-2022-0190  
Date Testimony Prepared: March 3, 2022

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

**CASE NO. EO-2022-0190**

**DIRECT TESTIMONY OF  
JON SCHULTE  
ON BEHALF OF  
CO-MO ELECTRIC COOPERATIVE**

**Tipton, MO  
March 2022**

**TABLE OF CONTENTS**

I. INTRODUCTION..... 3

II. PURPOSE AND SCOPE .....5

III. MERITS OF THE APPLICATION .....5

1. **INTRODUCTION**

2. **Q. Please state your name and job title.**

3. A. My name is Jon Schulte. I am employed by Co-Mo Electric Cooperative  
4. as the Director of Engineering and Operations.

5. **Q. What are your job duties?**

6. A. My oversight includes all aspects of the Cooperative's day to day business associated  
7. with operations, engineering, construction and maintenance.

8. **Q. What is your business address?**

9. A. Co-Mo is located at 29868 Hwy 5, Tipton, MO 65081.

10. **Q. Briefly describe the business of Co-Mo.**

11. A. Co-Mo is a rural electric cooperative first formed on May 10, 1939 when  
12. electric service was not being otherwise provided in the area by either investor-  
13. owned or municipally owned utilities and is engaged in the distribution of retail  
14. electric energy and related services to our customers, which we refer to as  
15. members or member-owners, in Cooper, Moniteau, Morgan, Camden, Benton,  
16. Cole, Pettis, Saline and Miller Counties. We have just over 32,000 connected  
17. meters, serve approximately 7.9 meters per mile, and have over 4,000 miles of  
18. energized lines. Our rates are set and our operations are governed by a board of  
19. directors selected through annual elections by our member-owners. The directors are  
20. themselves member-owners. We operate on a cooperative business plan which basically  
21. means that our customers or members are our owners and our purpose is not to  
22. make a profit. We have no outside investors. Co-Mo is one of forty Missouri  
23. distribution cooperatives in Missouri's three-tiered electric cooperative system

24. that collectively owns its own transmission and generation facilities throughout  
25. the state. Co-Mo is a part owner of and receives its transmission services from  
26. Central Electric Power Cooperative, headquartered in Jefferson City, Missouri. Central  
27. Electric Power Cooperative is a part owner of and receives its generation services from  
28. Associated Electric Cooperative, headquartered in Springfield, Missouri. During  
29. Winter Storm Uri last year Associated Electric Cooperative hit a new system peak  
30. of 5,549 MW, and despite the challenges of that event, there were no forced  
31. service interruptions for our members. Since its formation, Co-Mo has had a long  
32. history of providing safe, reliable and affordable electric service for its member-  
33. owners.

**34. Q. Please describe your professional qualifications.**

35. A. I a B.A. in Physics from the University of Central Missouri and a B.S. in Electrical  
36. Engineering from Missouri University of Science & Technology. I also have an M.S. in  
37. Electrical Engineering with an emphasis in Electric Power and an M.S. in Engineering  
38. Management with an emphasis in Finance, both from Missouri University of Science &  
39. Technology. I am a registered Professional Engineer in the State of Missouri. Most  
40. recently, I completed the NRECA Robert I. Kabat Management Internship Program  
41. through the University of Wisconsin-Madison.

**42. Q. Briefly describe your professional background and experience.**

43. A. I have been employed by Co-Mo for fifteen years. I became the Director of  
44. Engineering and Operations in December 2015. I served as the Manager of Engineering  
45. for Co-Mo from May 2007 to December 2015.

**46. Q. Have you ever testified in a proceeding before the Missouri Public Service**

47. **Commission?**

48. A. No.

49. **PURPOSE AND SCOPE**

50. **Q. What is the purpose of your testimony in this proceeding?**

51. A. The purpose of my testimony is to support the Application of Co-Mo which is  
52. seeking an Order from the Commission to allow Co-Mo to serve Fox Hollow  
53. Development. Fox Hollow is a planned residential subdivision recently annexed  
54. into the city of Boonville, Missouri.

55. **Q. Are you sponsoring any schedules in support of your direct testimony?**

56. A. Yes. I am sponsoring **Highly Confidential Schedule JS-01** (Feasibility Study) and  
57. **Schedule JS-02** (Map of existing facilities).

58. **II. MERITS OF THE APPLICATION**

59. **Q. Does Co-Mo currently serve any member-owners inside the city limits of**  
60. **Boonville?**

61. A. Yes, approximately 13 homes which are mostly located around the edge of  
62. Boonville's city limits.

63. **Q. How is it that Co-Mo can serve those member-owners but not new ones in**  
64. **newly annexed areas?**

65. A. Co-Mo was serving those member-owners prior to their property being  
66. annexed so we have the right to continue providing service to them, just not new  
67. structures. This goes even so far as Co-Mo not being able to provide new  
68. service if, for example, the member-owner owned a vacant lot next to their house  
69. and wanted to build a new structure on it. We could not serve that new structure

70. unless we reached an agreement with Ameren to do so and brought that Territorial  
71. Agreement before the Commission for approval.

**72. Q. Has Co-Mo conducted a feasibility study respecting its ability to serve  
73. and to assume the new load on its system?**

74. A. Yes. Co-Mo has conducted a full feasibility study, included as **Highly**  
75. **Confidential Schedule JS-01** that shows that Co-Mo financially and  
76. operationally is fully capable and able to serve in such a way that will benefit all  
77. Co-Mo members.

**78. Q. Is Co-Mo capable of meeting Mr. Thurman's construction schedule?**

79. A. Yes. The construction schedule has utilities, water and sewer being installed  
80. from April through June of 2022 with construction of homes set to begin in July.  
81. Co-Mo has obtained all of the necessary permits, franchises, and easements to  
82. serve Fox Hollow, as well as completed all necessary engineering studies and  
83. deployment plans. Provided the current Procedural Schedule is adhered to, and  
84. the Commission rules favorably on this Application, Co-Mo should be able to  
85. meet Mr. Thurman's construction schedule.

**86. Q. What is Co-Mo's operational ability to serve all or portions of Fox  
87. Hollow by January 18, 2025, three years from the effective date of the annexation?**

88. A. Co-Mo is currently able to serve all of Fox Hollow from a capacity  
89. standpoint and we expect our construction to connect the subdivision to be  
90. completed in July 2022 assuming the Commission grants our Application.  
91. Attached as **Schedule JS-02** is a map and accompanying detail showing  
92. Cooperative's existing electric service facilities with adequate and necessary

93. service capability located within one mile of the boundaries of Fox Hollow.

**94. Q. Please describe the physical locations Co-Mo's existing and planned facilities to  
95. serve Fox Hollow.**

96. Co-Mo plans to serve the first two phases of the Fox Hollow subdivision from the

97. existing facilities that are currently serving load on adjacent parcels. Co-Mo is

98. also working on upgrades in the area to increase capacity of its facilities along

99. State Highway 98 which borders Fox Hollow on the north. As the subdivision

100. grows into phase three and beyond, Co-Mo has engineered plans to bring

101. additional facilities to the Fox Hollow subdivision. Co-Mo's power provider,

102. Central Electric Power Cooperative, is working on a distribution substation along

**103. State Highway U which would become the main feed for Fox Hollow. Highly**

**104. Confidential Schedule JS-01** contains a map which shows the electrical layout

**105. Co-Mo intends to use to serve within Fox Hollow as well as a map showing the**

**106. route where Co-Mo currently has easements to bring in additional facilities to**

**107. serve the Fox Hollow subdivision.**

**108. Q. Based on existing lines and facility locations, will Co-Mo serving Fox**

**109. Hollow result in Co-Mo crossing over any existing Ameren lines or facilities?**

110. A. Co-Mo will not need to cross any existing Ameren lines or facilities to serve

111. the first two phases of Fox Hollow. We currently have electric facilities located

112. on the south side of Highway 98 which lies along the north boundary of Fox

113. Hollow so very minimal construction is even needed to connect to the Fox

114. Hollow development. To serve the last phases of Fox Hollow, we will need to

115. construct a line which would cross under Ameren Missouri's existing lines.

116. However, that crossing and line construction is inevitable regardless of Fox  
117. Hollow and is already in our current workplan. Allowing Co-Mo to serve the entire Fox  
118. Hollow subdivision prevents duplication of electrical infrastructure in that area.

**119. Q. Would Co-Mo serving Fox Hollow minimize unnecessary encumbrances  
120. on the property and landscape?**

121. A. Absolutely. Co-Mo's planned construction of the Fox Hollow subdivision  
122. includes all underground lines so there will be minimal above-ground  
123. encumbrances on the area and landscape. This benefits public safety and  
124. aesthetics. There is an airport just to the east of Fox Hollow and Co-Mo took that  
125. into account when laying out the services within Fox Hollow to abide by FAA  
126. rules and regulations.

**127. Q. Does this conclude your Direct Testimony?**

128. A. Yes, it does.



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


In the Matter of the Application of Co-Mo )  
Electric Cooperative for Approval of ) Case No. EO-2022-0190  
Designated Service Boundaries Within )  
Portions of Cooper County, Missouri. )

**AFFIDAVIT OF JON SCHULTE**

STATE OF MISSOURI )  
 )ss  
COUNTY OF Monitau )

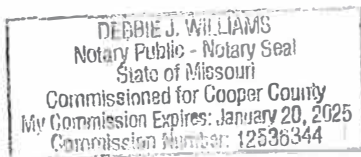
Jon Schulte, being first duly sworn on his oath, states:

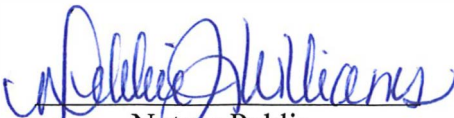
1. My name is Jon Schulte. I am the Director of Engineering and Operations of Co-Mo Electric Cooperative.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Co-Mo Electric Cooperative consisting of 8 pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.

  
WITNESS NAME

Subscribed and sworn to before me this 3 day of March 2022.

(notary seal)



  
Notary Public