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October 26, 2005

**FILED**  
GREGORY C. STOCKARD (1904-1993)  
PHILIP A. DUCK (1924-1991)  
EUGENE E. ANDERHECK (1923-2004)  
PETER B. SCOTT (1966-2005)

OCT 31 2005

Missouri Public  
Service Commission

Ms. Colleen M. Dale  
Secretary  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102


Re: In the Matter of the Application of Girardeau Stevedores Contractors for a Change of  
Electric Supplier (from SEMO Electric Cooperative to AmerenUE)  
Case No: EO-2006-0145

Dear Ms. Dale:

Enclosed for filing in the above referenced matter please find an original and  
seven copies of SEMO Electric Cooperative's Entry of Appearance and Statement of Position.

Thank you in advance for your prompt attention to this matter. If you should have any  
questions or comments, please do not hesitate to contact my office.

Sincerely yours,



Rodric A. Widger

RAW/dw

Cc: Office of Public Counsel  
PSC Staff Counsel  
AmerenUE  
Girardeau Stevedores Contractors  
Reuben Jeane

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

**FILED<sup>2</sup>**  
OCT 31 2005  
Missouri Public  
Service Commission

In the matter of the Application of )  
Girardeau Stevedores Contractors )  
for a Change of Electric Supplier )  
(from SEMO Electric Cooperative ) Case No. EO-2006-0145  
to AmerenUE) )

**ENTRY OF APPEARANCE AND STATEMENT  
OF POSITION**

1. COMES NOW SEMO Electric Cooperative, Inc., and enters its appearance in this proceeding by and through the undersigned counsel. Notices, correspondence, and orders should be directed to the following:

Rodric A. Widger  
Andereck, Evans, Milne, Peace & Widger, L.L.C.  
1111 S. Glenstone #2-100  
P.O. Box 4929  
Springfield MO, 65808-4929  
(417) 864-6401  
Fax: (417) 864-4967  
Email: rwidger@lawofficemo.com.

2. SEMO Electric Cooperative, Inc., opposes the application for reason that the Applicant has failed to allege facts that support a finding that a change of supplier is in the public interest. Further elaborating on this position, SEMO Electric Cooperative has attached the affidavit of Reuben Jeane, its General Manager.

Respectfully submitted,

**ANDERECK, EVANS, MILNE,  
PEACE & WIDGER, L.L.C.**

By: Rodric A. Widger  
Rodric A. Widger, #31458  
1111 S. Glenstone  
P.O. Box 4929  
Springfield, MO 65808-4929  
(417) 864-6401 Phone  
(417) 864-4967 Facsimile  
ATTORNEYS FOR  
SEMO ELECTRIC  
COOPERATIVE, INC.

**CERTIFICATE OF SERVICE**

The undersigned certifies that a complete copy of the foregoing instrument was served upon:

PSC Staff Counsel  
P.O. Box 360  
200 Madison Street, Suite 800  
Jefferson City, MO 65102

Office of Public Counsel  
P.O. Box 7800  
200 Madison Street, Suite 640  
Jefferson City, MO 65102

AmerenUE  
1901 Chouteau Ave  
P.O. Box 66149 Mail Code 131  
St. Louis, MO 63166

Girardeau Stevedores Contractors  
107 Rushing Road  
Scott City, MO 63780

By enclosing same in envelopes addressed to the attorneys of record of said parties at their business addresses as disclosed in the pleadings of record therein, with first class postage fully prepaid, and by depositing said envelope in a U.S. Post Office mail box in Springfield, Missouri, on October 26, 2005.

Rodric A. Widger  
Rodric A. Widger


# AFFIDAVIT

Reuben Jeane, of lawful age and duly sworn on his oath, affirms that the following is true to the best of his knowledge, information, and belief:

1. My name is Reuben Jeane. I am employed as the General Manager of SEMO Electric Cooperative, Inc.
2. I have reviewed the application of Girardeau Stevedores Contractors and I am aware of the circumstances of its electric distribution service.
3. SEMO Electric Cooperative, Inc., opposes the Application for reasons including, but not limited to, the following:
  - a. To my information and belief, Girardeau Stevedores Contractors has not formally applied for three phase electric service. However, its desire for three phase service has been discussed in light of SEMO's line extension policies applicable to all members.
  - b. Upon applicant's request, SEMO stands ready to provide three phase service. Such service would require conversion of approximately twelve (12) miles of overhead distribution line from single phase at Applicant's expense in accord with SEMO's line extension policy. Applicant has been unwilling to undertake this expense. SEMO has no other customers or facilities that would benefit from this expense.
  - c. Applicant's request is not based on the quality of service provided by SEMO but rather is motivated by Applicants understandable economic self-interest. Applicant has not presented facts that would support an order finding that a change of supplier is in the public interest for reason other than rates, as required by law.
  - d. SEMO is willing to consider solutions to Applicant's circumstance that are beneficial to all parties.

4. Further affiant sayeth not.

10/23/08  
Date

  
Reuben Jeane

STATE OF MISSOURI                    )  
  ) SS  
COUNTY OF Greene                    )

On this 25th day of October, 2005, before me personally appeared to me known to be the person described in and who executed the foregoing instrument and acknowledges that he executed the same as his free act and deed.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal at my office in Springfield, Missouri the day and year first above written.

Dana E Wells  
Notary Public

My Commission Expires:

