

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

In the Matter of the Joint Application of Union )  
Electric Company, d/b/a Ameren Missouri, )  
and Three Rivers Electric Cooperative, )  
for an Order Approving a Territorial Agreement )  
in Cole and Osage Counties, Missouri )

**File No. EO-2020-0315**

**RESPONSE TO ORDER DIRECTING NOTICE AND FILING**

**COMES NOW** the Staff of the Missouri Public Service Commission, through counsel, and states:

1. On May 27, 2020 Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed an application seeking authority to sell, transfer, and otherwise dispose of a portion of its franchise to Three Rivers Electric Cooperative (“Three Rivers”). Ameren and Three Rivers also jointly applied for orders authorizing a customer exchange and establishing exclusive service territories in portions of Cole and Osage Counties.

2. On June 11, 2020 the Commission ordered Staff to file a pleading stating when it anticipates filing its recommendation and whether a new certificate of convenience and necessity (“CCN”) will be required.

3. Staff anticipates filing its recommendation by September 18, 2020. A new CCN is not required because the involved areas are within Ameren’s existing territorial boundaries.<sup>1</sup>

**WHEREFORE**, Staff submits this pleading for the Commission’s consideration and information.

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<sup>1</sup> See *Order Approving Tariffs*, In the Matter of the application of Union Electric Company, Case No. EA-87-159 (Aug 9, 1991).

Respectfully Submitted,

**/s/ Karen E. Bretz**

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**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case on this 17<sup>th</sup> day of July, 2020.

**/s/ Karen Bretz**