

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

In the Matter of the Joint Application of)
Co-Mo Electric Cooperative and Union Electric)
Company d/b/a Ameren Missouri for an) **File No.: EO-2022-0332**
Order Approving a Territorial Agreement in)
Cooper, Cole, and Moniteau Counties,)
Missouri)

**STAFF’S REQUEST FOR SUSPENSION
OF ORDER TO FILE RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), through the undersigned counsel, and requests the Commission’s order suspending its order requiring Staff to file a recommendation.

On September 22, 2022,¹ the Commission issued its order requiring staff to file a recommendation about the “proposed territorial agreement” no later than September 29. The Commission set October 6 as the deadline for replies. That territorial agreement (the “May 31 TA”) was filed on May 31, 2022, and Co-Mo Electric Cooperative (“Co-Mo”) and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed a Joint Submission of Legal description on September 12 describing the areas to be covered by the May 31 TA.

Staff is advised that Co-Mo and Ameren Missouri have now obtained a modified legal description from a title company and that those legal descriptions are now being reviewed by Co-Mo, Ameren Missouri, and the City of Boonville. It is Staff’s understanding that Co-Mo and Ameren Missouri intend soon to file a pleading setting out an amended proposed territorial agreement which they have made and wish approved.

¹ All date references will be to 2022 unless otherwise stated.

Accordingly, Staff states that a recommendation on the May 31 TA appears now moot and states further that it can make no recommendation on an anticipated amended TA until it has been filed or at least been received by Staff.

Staff asks the Commission to order Co-Mo and Ameren Missouri to file either a pleading setting out the territorial agreement which they wish approved or a status report by a deadline to be determined by the Commission; and that the Commission shall otherwise suspend its order requiring a Staff recommendation until further Commission orders.

WHEREFORE, the Staff respectfully prays for such relief as is described in the premises.

Respectfully submitted,

Paul T. Graham

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CERTIFICATE OF SERVICE

The undersigned certifies by his signature below that on September 28, 2022, he filed the above captioned pleading in the EFIS file of the Missouri Public Service Commission.

Paul T. Graham