

**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)	Case No. EO-2020-0315
Cooperative, Inc. for an Order)	
Approving a Territorial Agreement)	
in Cole and Osage Counties,)	
Missouri)	

**OPC REPLY WITHDRAWING REQUEST
FOR A REVISED TERRITORIAL AGREEMENT**

COMES NOW the Office of the Public Counsel (“OPC”) and for its reply withdrawing the request for a revised territorial agreement, states:

1. On September 24, 2020, the OPC filed a response to the territorial agreement between Union Electric d/b/a Ameren Missouri (“Ameren”) and Three Rivers Electric Cooperative (“TREC”) to highlight TREC member opposition to the proposed transfer, and to request the applicants pursue options that would require no TREC members of fewer TREC members to transfer to Ameren.

2. On October 6, 2020, the OPC met with Ameren and TREC and discussed the OPC’s concerns. The applicants provided additional clarification on the reasons for the transfers under the territorial agreement.

3. On October 9, 2020, the applicants filed their Response of Joint Applicants to OPC Response and Recommendation wherein the applicants

responded to the OPC's concerns and provided further explanation of the territorial agreement and the reasons for the proposed transfers.

4. In light of the additional explanations and clarifications, the OPC hereby withdraws its request for the Public Service Commission to direct the applicants to submit a revised territorial agreement.

WHEREFORE, the Office of the Public Counsel respectfully withdraws its request for a revised territorial agreement.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By: /s/ Marc D. Poston

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 15th day of October 2020.

/s/ Marc Poston
