

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

In the Matter of the Joint Application of Osage )  
Valley Electric Cooperative Association and the )  
City of Rich Hill for Approval of a Change of ) **File No. EO-2022-0009**  
Electric Supplier for Customers in Bates County )  
For Reasons of Public Interest )

In the Matter of the Joint Application of Osage )  
Valley Electric Cooperative Association and )  
The City of Rich Hill, Missouri for Approval of a )  
Written Territorial Agreement Designating the ) **File No. EO-2022-0073**  
Boundaries of each Electric Service Supplier )  
Within the City of Rich Hill, Bates County, Missouri )

**STAFF REPLY TO JOINT MOTION TO CONSOLIDATE**

**COMES NOW** Staff of the Missouri Public Service Commission, through the undersigned counsel, and for its Reply to Joint Motion to Consolidate filed by the Applicants, respectfully states as follows:

1. On July 9, 2021, Osage Valley Electric Cooperative Association (“Osage”) and the City of Rich Hill (“Rich Hill”) (collectively the “Applicants”) filed a Joint Application for Change of Electric Supplier as File No. EO-2022-0009.

2. On September 9, 2021, the Applicants filed a Joint Application for Approval of Territorial Agreement as File No. EO-2022-0073. On September 14, 2021, the Applicants filed a Joint Motion to Consolidate File Nos. EO-2022-0009 and EO-2022-0073.

3. In their motion to consolidate, the Applicants stated, “The Change of Supplier case [i.e., EO-2022-0009] involves the transfer of electric utility service for all customers of Rich Hill to Osage Valley” and “This case [i.e., EO-2022-0073] involves a request for approval of a Territorial Agreement concerning those same customers which

would make clear that Osage Valley has all electric service rights, as between Applicants, within the City of Rich Hill.”

4. In addition to the reasons for consolidation stated by the Applicants in their motion, Staff notes that the EO-2022-0073 application “references” certain information included in the EO-2022-0009 application and thus does not “include a copy” of such information with the EO-2022-0073 application; in other words, evidence to support one application is incorporated by reference from the other case. Staff believes this proves that much of the evidence to support the applications, including but not limited to data request responses, will be the same in both cases. The cases should be consolidated to allow evidence to be used in both cases, to further administrative efficiency and save time of the parties and the Commission.

**WHEREFORE**, Staff submits this Reply to Joint Motion to Consolidate and concurs with the Applicants’ request to consolidate File Nos. EO-2022-0009 and EO-2022-0073, and prays the Commission issue an order consolidating such cases.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to parties of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on this 20<sup>th</sup> day of October 2021.

**/s/ Jeffrey A. Keevil**