

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

In the Matter of the Application of Co-Mo            )  
Electric Cooperative for Approval of                )  
Designated Service Boundaries Within            )  
Portions of Cooper County, Missouri             )        **File No.: EO-2022-0190**

**STAFF’S MOTION FOR LEAVE TO PROPOUND  
ADDITIONAL DATA REQUESTS**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”) and respectfully prays the Commission’s leave to propound additional data requests (“DR”), attached at **Attachment A**, stating further:

1. On January 18, 2022,<sup>1</sup> Co-Mo Electric Cooperative (“Co-Mo”) filed an application for approval of designated service boundaries within portions of Cooper County, Missouri per Section 386.800, RSMo. On March 2, the Commission issued its Order Setting Procedural Schedule (“Procedural Order” or “Order”). The order set March 17 as the deadline for propounding data requests based on Co-Mo’s direct testimony. On March 17, the Staff propounded data requests upon Co-Mo.

2. Based Co-Mo’s feasibility study, Staff has determined that two further questions should be propounded related to the total cost of Co-Mo’s proposal to provide electrical service in the Fox Hollow Development area.<sup>2</sup> Based upon Aaron Bradshaw’s direct testimony, Staff has determined that one further question should be propounded concerning the subject of “broadband” which Aaron Bradshaw addressed.

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<sup>1</sup> All date references will be to 2022 unless otherwise indicated.

<sup>2</sup> The “Fox Hollow Development area” has been used from time to time in the pleadings filed in this case to refer to the area in dispute between Co-Mo and Ameren Missouri in the Section 386.800, RSMo proceedings.

3. In support of this request to propound additional data requests concerning the feasibility study: Staff asks the Commission to consider that Co-Mo did not file its feasibility study with its application as was required by Rule 20 CSR 4240-20.045 (4), or with Aaron Bradshaw's Direct Testimony, which was due and filed on March 7. Co-Mo, instead, filed the feasibility study on March 11 with its Notice of Filing of Highly Confidential Schedule AB-07 to the Direct Testimony of Aaron Bradshaw (Appendix H to Co-Mo's Application).

4. In support of this request to propound an additional data request concerning the broadband testimony, Staff contends that the information sought will serve the Commission's interests in hearing evidence relevant to the Section 386.800, RSMo, seven factors it must consider in determining whether an application is detrimental to the public interest.

5. Not to presume upon the Commission's ruling on this motion but to enable Co-Mo immediately to begin working on the proposed DRs, the Staff has propounded them on Co-Mo contemporaneously with this motion.

**WHEREFORE**, the Staff prays for the relief described in the body of this motion and for such other and further orders as the Commission deems appropriate.

**Respectfully Submitted,**

/s/ Paul T. Graham #30416  
Senior Staff Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Mo 65102-0360  
(573) 522-8459  
Paul.graham@psc.mo.gov

**CERTIFICATE OF SERVICE**

The undersigned by his signature below certifies that the foregoing pleading was served upon all counsel of record on this March 18, 2022 by electronic filing in EFIS, electronic mail, hand-delivery, or U.S. postage prepaid.

/s/ Paul T. Graham

<b>Data Request #</b>	
Case/Submission Tracking Number	EO-2022-0190
Submitting Technical Staff Member	Michael Stahlman
Case Type	
Company Name	CO-MO Electric Cooperative, Inc.
DR Issue	General Information & Miscellaneous
Sub Issue 1	
Sub Issue 2	Certificates of Convenience/Feasibility Analysis
Requested From and Email Address	Meagan Ray
Brief Description	Total Cost
Data Request Information	Please provide Co-MO's estimate of the total cost of the project. For each year of the project's construction, please break out the cost between all its components, including, but not limited to, construction cost, right-of-way acquisition, financing cost, administration, etc.

<b>Data Request #</b>	
Case/Submission Tracking Number	EO-2022-0190
Submitting Technical Staff Member	Michael Stahlman
Case Type	
Company Name	CO-MO Electric Cooperative, Inc.
DR Issue	General Information & Miscellaneous
Sub Issue 1	
Sub Issue 2	Certificates of Convenience/Feasibility Analysis
Requested From and Email Address	Meagan Ray
Brief Description	Total Cost
Data Request Information	Please provide Co-MO's estimate of the total cost of each phase of the project. For each year of the phased construction, please break out the cost between all its components, including, but not limited to, construction cost, right-of-way acquisition, financing cost, administration, etc.

<b>Data Request #</b>	
Case/Submission Tracking Number	EO-2022-0190
Submitting Technical Staff Member	Claire Eubanks
Case Type	
Company Name	CO-MO Electric Cooperative, Inc.
DR Issue	General Information & Miscellaneous
Sub Issue 1	
Sub Issue 2	Certificates of Convenience/Feasibility Analysis
Requested From and Email Address	Meagan Ray
Brief Description	Broadband deployment
Data Request Information	Refer to Page 15, lines 296-299 of Aaron Bradshaw’s Direct Testimony. (1) Describe Ameren’s make-ready requirements. Specifically, what about those requirements have made working with Ameren Missouri on broadband deployment difficult. (2) Provide a unit-cost break down of the pole attachment-related cost mentioned on line 299. Explain how the Ameren Missouri pole attachment-related costs compare to deploying broadband underground.