

In the Matter of the Joint Application of
City of Columbia, Missouri and Boone
Electric Cooperative for an order approving
the change in electric supplier for certain
customers for reasons in the public interest.

STAFF RESPONSE TO ORDER DIRECTING FILING

COMES NOW, Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and submits this *Staff Response to Order Directing Filing* to the Missouri Public Service Commission. In support, Staff respectfully states the following:

1 . On July 14, 2014, the City of Columbia, Missouri (“Columbia”) and Boone Electric Cooperative (“Boone Electric”), hereinafter collectively known as “Applicants”, filed a *Joint Application* with the Commission requesting an order approving Applicants’ proposed Customer Exchange Agreement, which provides for a change in the electric supplier from Boone Electric to Columbia for the structures of twenty-nine (29) members currently being served by Boone Electric.

2. On July 15, 2014, the Commission issued an *Order Directing Filing* by which it directed Staff to file a response by July 25, 2014, setting forth suggestions as to: “[(1)] The timing, content, and manner of delivery for a notice of this action to each customer whose service is subject to the *Joint Application*, and [(2)] When Staff can file a recommendation on the application.” (Footnote omitted.)

3. Staff requested and obtained from Boone Electric a current list of its members who would be affected if the Customer Exchange Agreement is effectuated. When comparing the members listed in the *Joint Application* as Attachment 1 to the

current list, Staff found that there are at least three members on the current list that are not listed on Attachment 1. Moreover, both lists are of members and may not include the owners of the structures themselves, e.g., they may be rental properties. Both current members paying Boone Electric for service to the structures and the owners of the structures should get notice of and an opportunity to be heard on the proposal to change the service provider to the structures. Staff recommends that the Commission direct the Applicants to provide it with a listing of the current members¹ and owners of record of the structures² that they propose be served by Columbia instead of Boone Electric together with a current address for each so that the Commission may mail notice of the *Joint Application* to each and advise them of the intervention date the Commission establishes for this case.

4. In terms of the content of the notice, Staff suggests that the notice state that Boone Electric and Columbia are seeking Commission approval to change the electric service to the structures on the parcels from the Boone Electric to Columbia in Case No. EO-2015-0012. Additionally, the notice should inform them of the manner and method by which they may intervene in the case to participate and be heard.

5. In terms of the method of delivery, Staff believes that the best manner to provide notice to those affected is by mail.

6. Staff is in the process of sending data requests to Columbia and Boone Electric, therefore time will be needed for responses to be received and reviewed by Staff. To allow Staff the opportunity to thoroughly investigate the matters raised by the

¹ Boone Electric should have this information in its records.

² This information is available from the Boone County Assessor or in the records of the Boone County Recorder of Deeds.

Joint Application, Staff respectfully requests until October 24, 2014 to file its recommendation.

WHEREFORE, Staff files this *Staff Response to Order Directing Filing* making its recommendations regarding notice and advising the Commission when Staff anticipates it will file its recommendation in the body of this pleading.

Respectfully submitted,

/s/ Akayla J. Jones

Akayla J. Jones
Legal Counsel
Missouri Bar No. 64941
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 526- 6036 (Telephone)
(573) 751-9285 (Fax)
akayla.jones@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically on this 25th day of July, 2014 to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Akayla J. Jones