

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

In the Matter of the Application)
Of Judith Turner-Davis for)
Change of Electric Supplier to)
Platte-Clay Electrical Cooperative from) **File No. EO-2024-0035**
Evergy Missouri West, Inc.)
d/b/a Evergy Missouri West)

RESPONSE OF PLATTE-CLAY ELECTRIC COOPERATIVE, INC.
TO APPLICATION OF JUDITH TURNER-DAVIS
FOR A CHANGE OF ELECTRIC SUPPLIER

COMES NOW Platte-Clay Electric Cooperative, Inc. (“Platte-Clay”) by and through its undersigned counsel, and for its Response to the Application of Judith Turner-Davis (“Applicant”) for Change of Electric Supplier, pursuant to the Missouri Public Service Commission’s (“Commission”) Order Directing Notice and Directing Responses to Application (“Order”) issued on August 9, 2023 and, in support thereof, states as follows:

1. On August 7, 2023, Judith Turner-Davis (the “Customer”) filed an Application for Change of Electric Service Provider (“Application”) with the Commission, requesting a change from Evergy Missouri West to Platte-Clay Electric Cooperative (“Platte-Clay”) for 18305 Lober Road, Weston, Missouri 64098 (the “Property”).
2. Platte-Clay admits it serves many locations within the immediate vicinity of the Property.
3. Platte-Clay takes no position on the sufficiency of the Application and takes no position on whether the Commission approve or deny Applicants’ request.

4. If Ordered to serve this location by the Commission, Platte-Clay is ready, willing and able to so serve. However, Platte-Clay would need to build $\frac{1}{4}$ to $\frac{1}{2}$ of a mile (dependent upon easement restrictions) of line to serve this Property. Pursuant to Platte-Clay's policies that apply to all new services, some of the cost of construction will be required to be paid for by Applicant.
5. Platte-Clay is without knowledge to confirm or deny the remaining allegations of the Application.
6. Correspondence, orders, and other communications regarding this Application should be directed to the undersigned.

Respectfully submitted,

FRIEL, McCORD & SMILEY, LLC

By: /s/ Megan E. McCord
Megan E. McCord, # 62037
P.O. Box 14287
Springfield, MO 65814
(417) 227-8405 Phone
mmccord@reclawfirm.com

ATTORNEY FOR PLATTE-CLAY
ELECTRIC COOPERATIVE

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed on EFIS on this 10th day of September 2023, with notification of the same being sent to all counsel of record. This pleading was also sent by electronic mail or U.S. Mail to all parties/counsel of record.

/s/ Megan E. McCord