

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

In the Matter of the Application of)
Heather L. Cline for Change of Electric)
Supplier from Liberty Utilities to Southwest) File No. EO-2024-0098
Electric Cooperative,)
)
)

**RESPONSE TO APPLICATION OF HEATHER L. CLINE FOR CHANGE OF
ELECTRIC SUPPLIER FROM LIBERTY UTILITIES TO SOUTHWEST ELECTRIC
COOPERATIVE**

COMES NOW Southwest Electric Cooperative (“SWEC”) by and through its undersigned counsel, and for its response to the Application of Heather L. Cline (hereinafter “Cline”) for Change of Electric Supplier, respectfully states as follows:

1. SWEC admits that Cline’s address is 1629 Highway 32, Bolivar, MO 65613.
2. Paragraph 2 speaks for itself. SWEC is without information to confirm or deny the allegations contained in paragraph 2.
3. A change in electric power supplier in this case is not in the public interest, nor is such request supported by Missouri law or the regulations promulgated by the Missouri Public Service Commission on this subject matter.
4. A change in electric power supplier in this case is not in the public interest, nor is such request supported by Missouri law or the regulations promulgated by the Missouri Public Service Commission on this subject matter.
5. SWEC is without information to confirm or deny Cline’s allegations regarding Liberty Utilities’ charges for customer usage.
6. SWEC is without information to confirm or deny the allegations in paragraph 6.

7. Applicant's request for change of supplier is based exclusively on rate differential and is therefore contrary to Missouri's anti-flip flop laws under RSMo sections 393.106 and 394.315.

8. Should applicant be successful in her application, the following would need to be accomplished at applicant's expense before SWEC could provide service:

- a. Easements from two property owners must be obtained.
- b. Densely wooded right of way must be cleared.
- c. A highway crossing must be constructed.
- d. Underground boring or under-build on Liberty's existing transmission line must be accomplished.

9. A change in electric supplier would lead to unnecessary expense and duplication of services and facilities.

10. For the above stated reasons SWEC requests that the Application be Denied.

11. Correspondence, orders, and other communications regarding this Application should be directed to the undersigned.

CARNAHAN EVANS PC

By: /s/ Shawn Battagler

Shawn P. Battagler

Missouri Bar No. 51360

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Attorneys for Southwest Electric
Cooperative

CERTIFICATE OF SERVICE

The undersigned certifies that a complete copy of the foregoing instrument was served upon:

Missouri Public Service Commission
Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel
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Liberty Utilities
Legal Department
2751 N. High Street
Jackson, MO 63755

Southwest Electric Cooperative
Legal Department
1023 S. Springfield
PO Box 150
Bolivar, MO 65613

Heather L. Cline
1629 Highway 32
Bolivar, MO 65613

By enclosing same in envelopes addressed to the attorneys of record of said parties at their business addresses as disclosed in the pleadings of record therein, with first class postage fully prepaid, and by depositing said envelope in a U.S. Post Office mailbox in Springfield, Missouri, on October 16th, 2023.

/s/ Shawn P. Battagler