

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

Timothy Allegri, et al.	)	
	)	
Complainants,	)	
v.	)	File No. EC-2024-0015, et al.
	)	[consolidated]
Evergy Missouri West, Inc. d/b/a Evergy	)	
Missouri West,	)	
	)	
Respondent.	)	

**EVERGY MISSOURI WEST’S REPLY TO CO-COMPLAINANTS RESPONSES**

COMES NOW, Evergy Missouri West, Inc. d/b/a Evergy Missouri West (“Evergy Missouri West”) (collectively, the “Company” or “Evergy”), by and through its counsel and, for its response to the Complainant Timonthy Allegri’s “Answer to Consolidated Complaints and Dismissal With Prejudice” file on October 16, 2023, and various Co-complainants’ “Response To Answer Of Evergy Missouri West To Consolidated Complainants and Dismissal With Prejudice” filed on October 20, 23, and 24, 2024, states as follows.

1. On October 17, 2023, Mr. Timothy Allegri (“Complainant”) filed his “Answer to Consolidated Complaints and Dismissal With Prejudice” which replied to Evergy’s Answer and Motion To Dismiss which was filed on August 30, 2023.

2. On October 20, 23, and 24, 2023, the following co-complainants also filed similar pleadings entitled “Response To Answer Of Evergy Missouri West To Consolidated Complainants and Dismissal With Prejudice” (collectively referred to as “Complainants’ Responses”) which were virtually identical in substance: Susan G. Bracken, Charles E. Bracken, Jesse L. Green, Jr., Denise Allegri, Norman Howard, Teresa Howard, Dwayne Marsh, Rebekah L. Marsh, Candance K. Robertson, Kendra B. Butner, and Victor Butner.

3. Since the assertions and arguments in Mr. Allegri's Response and Co-complainants Responses are similar in nature, this pleading will address them collectively.

4. Like the Complaints themselves, Complainants' Responses fail to make any allegations that Evergy has violated any statute, tariff, or Commission regulation, or order, as required by 20 CSR 4240-2.070(1). The Complainants' Responses also failed to state a claim upon which relief can be granted. On these grounds alone, the Complaints should be dismissed by the Commission. Instead, Complainants' Responses focus on issues that are before the circuit courts and should not be addressed by the Commission.<sup>1</sup>

5. The Complainants misunderstand the role of the circuit courts and the Commission, thinking that they both have statutory authority over eminent domain cases. (Complainant Allegri's Response, para. 7; Complainants' Responses, para. 7) As the Company has previously explained, Chapter 523 RSMo. gives the statutory authority to the courts, not the Commission, to resolve all factual and legal issues related to eminent domain issues. It also gives electric corporations the statutory authority to use the eminent domain process to secure easements necessary to serve the public use. See Section 523.010, RSMo.

6. The Complainant Allegri and his co-complainants, with the exception of Jesse L. Green, Jr., Norman Howard, and Candance K. Roberts<sup>2</sup>, are parties to the Lafayette County<sup>3</sup> or Johnson County<sup>4</sup> eminent domain proceedings in the circuit court and are currently availing

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<sup>1</sup> See Evergy Missouri Metro and Evergy Missouri West Reply To Staff Response, Motion For Expedited Treatment, and Motion For Injunction, (filed August 30, 2023).

<sup>2</sup> Jesse L. Green, Norman Howard, and Candance K. Roberts are not defendants in the eminent domain proceeding in Lafayette County circuit court proceeding, Case No. 23LF-CV00939 or in the Johnson County circuit court proceeding, Case No. 23JO-CC00142.

<sup>3</sup> Timothy Allegri, Denise Allegri, and Victor Butner & Kendra Butner, Co-Trustees of the Victor T. and Kendra B. Butner Trust are parties to the Lafayette County circuit court proceeding, Case No. 23LF-CV00939.

<sup>4</sup> Charles E. Bracken and Susan G. Bracken, Trustees of the Bracken Family Trust, Shelly Keys Howard, Teresa Howard, Dwayne Marsh and Rebekah L. Marsh are parties to the Johnson County circuit court proceeding, Case No. 23JO-CC00142.

themselves of the opportunity to raise any issues which they believe are pertinent to the proceeding, including any alleged “bad faith” negotiations, “arbitrary or unwarranted abuse of discretion” or other allegations that are pertinent to the eminent domain proceedings. Simply stated, the Commission is the wrong forum to raise issues related to eminent domain issues. Such issues are appropriate to be heard in the circuit courts and appellate courts.

7. The Commission itself has already reviewed its authority over condemnation proceedings, finding: “Additionally, Chapter 523 empowers the circuit court, and not the Commission, with authority over condemnation proceedings.”<sup>5</sup> In Missouri Landowners Alliance, et al. v. Grain Belt Express, LLC, et al., File No. EC-2021-0059 (“Grain Belt”), the Commission also held that it has no jurisdiction or authority to grant a public utility eminent domain.<sup>6</sup>

8. The Complainants question the scope of Evergy’s Certificate of Convenience and Necessity (“CCN”) and whether it includes property along Highway 13 where the transmission upgrade project is located.

9. The Commission records indicate that the Company’s CCN includes the property along Highway 13 in Lafayette and Johnson County. On January 18, 1938, the Commission issued its *Report and Order* which granted a CCN to EMW’s predecessor company, Missouri Public Service Company, which included substantial portions of Lafayette County and Johnson County.<sup>7</sup>

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<sup>5</sup> *Order Denying Staff’s Motion To Pursue An Injunction*, File No. EC-2024-0015 (issued August 31, 2023)

<sup>6</sup> *Report and Order*, p. 14, Missouri Landowners Alliance, et al. v. Grain Belt Express, LLC, et al., File No. EC-2021-0059

<sup>7</sup> See *Report and Order*, In the Matter of the application of the Missouri Public Service Corporation for a blanket certificate of convenience and necessity, authorizing it to construct, operate, and maintain extensions to its electric lines (exclusive of incorporated municipalities) in all or portions of Jackson, Lafayette, Pettis, Johnson, Cass, Bates, Henry, Benton, St. Clair, Vernon, Cedar, Barton, Dade, Harrison, Mercer, Grundy and Davies Counties; and to authorize a proposed territorial boundary line in Livingston County; all within the State of Missouri; all of the territory and territorial boundary lines in the above mentioned Counties, being more fully shown and described on the maps and in the descriptions attached hereto on the maps and in the descriptions attached hereto, marked Exhibits A-1 to A-19, inclusive, Case No. 9470 (issued January 18, 1938)(attached as Ex. 1).

10. Attached to the Commission's Report and Order is Exhibits A-1 through A-19 which include the certificated service area. (See Exhibit 2 attached) Exhibits A-3 and A-5 to the Commission's Report and Order in Case No. 9470 which define and identify the Company's certificated service area in Lafayette County and Johnson County, respectively, demonstrate that the Company's service area includes the area on both sides of Highway 13 where the transmission upgrade project is located.<sup>8</sup>

11. The Company's currently effective tariffs also include a legal description of EMW's service area by section, township, and range which include the area along Highway 13. (See EMW Tariff, P.S.C. No. 1, 1<sup>st</sup> Revised Sheet Nos. 13 and 14 attached as Ex. 4)

12. The legal descriptions for the properties of Susan G. Bracken, Charles E. Bracken, Jesse L. Green, Jr., Denise Allegri, Norman Howard, Teresa Howard, Dwayne Marsh, Rebekah L. Marsh, Candance K. Robertson, Kendra B. Butner, and Victor Butner in the current pending circuit court cases, are as follows:

Bracken: Section 2, Township 47, Range 26 (Johnson County)  
Allegri: Section 24, Township 48 North, Range 26 West (Lafayette County)  
Butner: Section 24, Township 48 North, Range 26 West (Lafayette County)  
Marsh Property #1: Section 25, Township 48, Range 26 (Johnson County)  
Marsh Property #2: Section 25, Township 48, Range 26 (Johnson County)  
Shelly and Teresa Howard: Section 2, Township 47, Range 26 (Johnson County)

Both the map and the legal description attached to the Report and Order demonstrate that each of these co-complainants' property descriptions are included in EMW's certificated areas, as designated in EMW's approved tariffs.

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<sup>8</sup> The approximate transmission upgrade route along Highway 13 has been highlighted in yellow for the convenience of the Commission on the Exhibits A-3 and A-5 which is part of Exhibit 2 attached. A more exact representation of the transmission upgrade route is contained in the attached Exhibit 3.

**WHEREFORE**, the Company respectfully submits its Reply to the Complainants' Response to EMW's Answer to Consolidated Complaints and Dismissal With Prejudice.

Respectfully submitted,

*/s/ Roger W. Steiner*

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**Attorney for Evergy Missouri Metro and Evergy Missouri West**

**CERTIFICATE OF SERVICE**

A copy of the foregoing has been served this 30<sup>th</sup> day of October 2023 on the pro se complainants in this proceeding via electronic service or U.S. mail postage prepaid.

*/s/ Roger W. Steiner*

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Roger W. Steiner

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

CASE NO. 9470

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 \*  
 In the matter of the application of the Missouri \*  
 Public Service Corporation for a blanket certi- \*  
 ficate of convenience and necessity, authorizing \*  
 it to construct, operate, and maintain extensions \*  
 to its electric transmission and distribution \*  
 lines (exclusive of incorporated municipalities) \*  
 in all or portions of Jackson, Lafayette, Pettis, \*  
 Johnson, Cass, Bates, Henry, Benton, St. Clair, \*  
 Vernon, Cedar, Barton, Dade, Harrison, Mercer, \*  
 Grundy and Daviess Counties; and to authorize \*  
 a proposed territorial boundary line in Living- \*  
 ston County; all within the State of Missouri; \*  
 all of the territory and territorial boundary \*  
 lines in the above mentioned Counties, being \*  
 more fully shown and described on the maps and \*  
 in the descriptions attached hereto, marked \*  
 Exhibits A-1 to A-19, inclusive. \*  
 \*  
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REPORT AND ORDER

This case is before the Commission upon the application of the Missouri Public Service Corporation, hereinafter referred to as the applicant, for an order granting it a certificate of convenience and necessity to construct, maintain and operate, as a public utility, electric transmission and distribution lines for the purpose of furnishing electric service to the public in the counties of Jackson, Lafayette, Pettis, Johnson, Cass, Bates, Henry, Benton, St. Clair, Vernon, Cedar, Barton, Dade, Harrison, Mercer, Grundy and Daviess, all in the State of Missouri. The areas within said counties in which the applicant seeks authority to construct the electric lines, as the public convenience and necessity require, are more fully hereinafter described.

In Livingston County, in which applicant now maintains and operates electric transmission lines, it asks that the Commission designate in this case the rural area of that county in which the applicant shall be

expected to construct and maintain electric lines for the purpose of serving the public located therein. It has heretofore received a certificate of convenience and necessity to construct, maintain and operate lines along designated routes, those lines now being in operation, but has not received authority to construct any additional lines along other routes. The County Court has not authorized it to locate electric pole lines along and across any other highways of that county.

The case was heard by the Commission at Jefferson City, Missouri, after due notice had been given, on the 17th day of December, 1937, at which time all interested parties were given an opportunity to be heard.

The applicant is a Missouri corporation engaged as a public utility in the rendition of water, gas and electric service in cities and towns, as well as rural areas adjacent to said cities and towns, in the aforesaid counties. Its principal operating office and postoffice address is Warrensburg, Missouri.

The evidence shows that the applicant has received, by orders of the respective county courts hereinabove named, with the exception of Livingston County, authority to construct, maintain and operate electric distribution lines along and across the public streets, roads and alleys, and other public places and grounds in each of the counties above named. Certified copies of the court orders of those counties are filed as a part of the application in this case. The applicant has also been granted authority by the various municipalities wherein it now operates in the aforesaid counties to construct, maintain and operate electric transmission lines and distribution systems within the corporate limits of the said towns and villages. As a condition precedent to the granting of a certificate of convenience and necessity by this Commission in any of the towns now served, or for the construction of electric lines along certain routes in the above counties, the applicant has presented to the Commission proof that it had received the required consent of the proper municipal authorities or orders of the respective county courts for the location of the proposed pole line

or lines along and across the streets, roads and highways of said incorporated or unincorporated areas, as the jurisdiction of the local authorities may require.

Attached to the application, marked Exhibits "A-1" to "A-19" inclusive, are maps and verbal descriptions of the respective areas of the counties in which the applicant seeks a certificate of convenience and necessity in this case to extend its lines. These exhibits show that the applicant does not ask that the authority sought cover all the counties above named. We note that the entire areas of Benton, Johnson and Harrison are included, while only portions of the others are included. A general map, marked Exhibit "A-1", shows the exact location of the lines delineating the territory in which the applicant seeks a certificate at this time, with the exception of Livingston County.

At the hearing the applicant corrected its petition wherein it describes the boundary line heretofore determined in a formal action before this Commission between the areas now served by the applicant and the Kansas City Power & Light Company. The two parties are in agreement in this description.

In Livingston County the applicant does not have authority from the county court to locate its lines as it may desire along the highways of that county, so without such consent of local authority it does not include in its petition a request for a certificate of convenience and necessity for that county, but asks that the Commission declare the line it has shown in its exhibit, and proposes to have it as a matter of record, as outlining the area in Livingston County wherein it should be expected to operate and extend service as against other public utilities which are now operating and may be called upon to serve the remaining portions of the county. As we mentioned above, it now has a line in that area, the northwestern part of Livingston County, and is operating a distribution system in the town of Chula. For these it has been granted, from time to time, certificates of convenience and necessity for the construction of



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the lines it now has in operation and for the operation of those lines.

The Prosecuting Attorney of Livingston County appeared at the hearing and asked that the case be continued in order that the county could have more time to look into this case, but upon further presentation of the issues involved and the position of the applicant, it was determined that the hearing should be held. It was apparent at the hearing that the applicant was not in a position to present a request for any authority of any kind concerning its operations in Livingston County, and in reviewing the evidence submitted the Commission now finds that in view of Section 5193 of the 1929 Revised Statutes of Missouri, the applicant was in no position to present any request for authority to operate in Livingston County. It is now operating at certain points in that county, but should it desire to extend its lines, our understanding of the law is that it will be required to seek a certificate of convenience and necessity for any further extension, and as a condition precedent to the granting of such authority, it must show that it has received the consent of the county court either for the specific line or for a prescribed area, as the court may determine. Our view of the position of the applicant in this case insofar as Livingston County is concerned is that the applicant can only ask to have the record show the area in which it professes its willingness to furnish the service should anyone want it and the conditions warrant the extension. The Commission has no power to grant any right or privilege upon such request. Nothing further need be said on that point in this case.

The Consumers Public Service Company, with headquarters at Brookfield, Missouri, now engaged in furnishing electric service in Iman, Sullivan, possibly Grundy and Mercer Counties, appeared and was opposed to the applicant's proposed line wherein it runs north and south along the east side of the City of Princeton. The Consumers Public Service Company states that it now has a line extending to Princeton over which it purchases from the municipal plant at Princeton electrical energy for transmission

over that line to its transmission system used in furnishing electric service to a number of cities and towns in those counties. The Consumers Public Service Company did not indicate that it had any demand for service in the area involved at this time, and did not indicate when it may be called upon to furnish the service. The applicant likewise did not indicate that it had any calls for service in that particular area at this time. This conflict will be discussed further below.

The evidence shows that the applicant has paid the \$5.00 filing fee required by law.

Attached to the application, marked Exhibits "B-1" to "B-17" inclusive, are certified copies of the orders of the county courts that have granted the applicant authority to construct electric transmission and distribution lines along and across the highways of the respective counties. The counties are Jackson, Lafayette, Pettis, Johnson, Cass, Bates, Henry, Benton, St. Clair, Vernon, Cedar, Barton, Dade, Harrison, Mercer, Grundy and Daviess.

The applicant also files as Exhibits "C" to "C-11" inclusive, a list of the names of other electric utilities whose systems are adjacent to the territory in which it is located and in which it seeks the authority herein named. Copies of correspondence it has had with those utilities pertaining to this matter are also attached. Also, as Exhibits "D" to "D-20", is a list of the names of other public utilities, communication and pipeline, whose lines may be affected by the applicant's construction from time to time, together with correspondence it has had with those utilities. Its Exhibit "E" lists the names of all parties who are interested as owners or operators of telephone lines, mutual, individually owned or otherwise, to whom letters were sent setting forth the authority the applicant is asking in this case. All these parties were given notices of the hearing herein.

The applicant states that before constructing any of its

transmission lines along the state highways it will secure from the State Highway Commission such authority as may be required by law for the proposed construction.

Applicant states that because of the increasing demand for electric service it is required continuously to extend and expand its transmission and distribution system, and that under the procedure it has heretofore followed under the laws of the State of Missouri, it has made an application for each extension, regardless of size, to serve new customers. During the year 1937, up to the date of the hearing, it made application for some 10 minor extensions, and it now has filed with it requests for service by parties located in rural territory, some of them very anxious to get the service at an early date. The applicant further states that each of these smaller extensions heretofore made have cost anywhere from \$31.00 to \$55.00 per extension. It claims that in some instances the cost of securing the certificate of convenience and necessity has amounted to more than the actual cost of constructing the physical property. By this case it hopes to eliminate that added cost, as well as expedite its procedure in arranging to take care of requests for service.

Applicant states that the transmission and distribution lines it will construct from time to time will be constructed in conformity with the National Electrical Safety Code, its specific rules and regulations on file with the Commission, and as the laws of the State of Missouri and the rules of this Commission may require. It further states that said lines and all equipment connected therewith will be maintained in a reasonably safe and adequate manner so as not to endanger the safety of the public or to interfere unreasonably with the service of other aerial lines.

In carrying out any construction program for which it now seeks authority, the applicant states that before the construction of any extension or before any major change is made in the location, phase or

voltage of any existing electric transmission line in the territory described in this proceeding, it will give at least fifteen days' notice to any and all other public utility or utilities whose lines or system may be affected. In giving such notice applicant agrees to show, in sufficient detail, what the proposed construction or alteration will be, to enable the representatives of the affected utilities to determine what action they may desire to take with reference thereto. Wherever such extensions or major alterations may cause inductive or other electrical interference with the existing lines of other public utility or utilities, the expense, if any, incurred in making such changes shall be determined by agreement between the parties operating such lines and the applicant, and in case of failure of the parties to reach such agreement in settlement thereof, the matter may be submitted to the Commission for arbitration and determination in the manner provided for in Section 118 of the original Act creating the Public Service Commission of the State of Missouri, now Section 5241 of the 1929 Revised Statutes of Missouri.

Counsel for the Barton County Electric Cooperative and the Ozark Electric Cooperative appeared in the interest of those cooperative associations. Those associations, incorporated under the laws of the State of Missouri, are composed of residents within the prescribed county or area who have associated themselves together and incorporated for the purpose of borrowing from the Federal Government, through the Rural Electrification Administration, funds necessary to construct rural lines within the area for the purpose of securing for themselves electric service. Their special interest in this case is that they be given notice the same as any other public utility by the applicant prior to the construction of any line the applicant may determine is required in the area in which it now seeks a certificate and in which the cooperative will operate. We see no reason why that information should not be given to the cooperative as well as to any other public utility. It must be understood, however, that with the granting

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of the authority herein sought by the applicant all parties of interest now existing in the counties have notice of the applicant's authority, and further, that if at any time in the future the applicant determines to construct a line along a given highway, it will give notice to those utilities who may have lines along or across that particular highway or route of the line, whose service or the operation of whose line may be adversely affected by the construction and operation of the proposed line. If there is no other line along the highway or across it that may be crossed or paralleled by the construction of the applicant at the particular time, we see no reason why notice should be given to any utility, including the cooperative who may have lines in other parts of the county but not affected by the particular construction.

It is not understood by the Commission that the applicant is seeking exclusive authority to operate in the area, but authority to extend its electric lines from its present system or from the system that it may have in existence at any given time in the future, in order that prospective customers adjacent to the then existing system can receive electric service as promptly as possible and at minimum expense. It is required, 325 Mo. 1217, 315 SW (2) 67, to secure from this Commission a certificate of convenience and necessity before beginning any work to extend its service to new customers who reside outside of incorporated cities, towns and villages within the area herein prescribed. In order to avoid delay in securing that authority, which in turn delays the customer from receiving the service and increases the cost of the construction, it claims it seeks authority to extend its lines to new customers within the prescribed area in conformity with its extension rule now in effect or the extension rule it may have in effect at the time an extension is to be made.

A utility, under 315 Mo. 312, 286 SW 84, is required to extend its lines to a new customer or customers who will comply with the terms

and requirements of that utility's extension rule. Likewise the Commission cannot require the utility to extend its lines to any new customer except in conformity with the existing extension rule that may be filed and in effect. So it is not understood that the applicant intends to change its practice in extending its lines to new customers within the prescribed area, but will continue to extend its lines in conformity with its extension rule, taking into account the various conditions, including economic conditions, surrounding each and every proposed extension. Of course the reasonableness of its extension rule can be examined at any time conditions may warrant. It therefore appears to the Commission beneficial to the public and desirous to allow the applicant to use its funds to make extensions where expected revenues will justify at as low cost as good construction will permit, so that the public served will have the benefit of the lowest possible rates for the service to be rendered. Should the Cooperative have electric lines in operation along the route wherein the applicant may desire to build electric lines, the applicant, of course, will give the Cooperative notice of the proposed construction, and if the parties cannot agree upon the issues involved the matter may be submitted to the Commission for arbitration.

With reference to the objections made by the Consumers Public Service Company mentioned above, we see no reason at this time for making any changes in the line as proposed for Mercer County, because neither the applicant nor the Consumers Public Service Company has submitted to the Commission any proof that they expect in the near future to make any extensions in the rural area adjacent to the city of Princeton. Should the applicant have a request to extend its lines in that area that may adversely affect the Consumers Public Service Company but not now served by the Consumers Public Service Company, the matter can be brought to the attention of the Commission for determination of the particular issues that

may be involved at that time, and should the Consumers Public Service Company have a request for service in the area now proposed to be covered by the applicant, it will be required to bring the matter to the attention of the Commission for a certificate of convenience and necessity to serve the area not heretofore served by it. Thereupon the applicant will be given proper notice of any proposed extension into the area included by the applicant in the present case.

Upon the evidence herein submitted, the Commission finds that the authority herein sought and that which the Commission can give should be granted. We find that similar authority has been granted to other utilities, and our records show that the granting of such authority has, in no instance, affected adversely the interests of the public served. Such authority has been granted the Union Electric Company of Missouri, the Kansas City Power & Light Company, The Empire District Electric Company, the Ozark Utilities Company and the Lawrence County Water, Light & Cold Storage Company.

After due consideration, it is therefore

ORDERED: 1. That the Missouri Public Service Corporation be and is hereby authorized to construct, maintain and operate electric transmission lines and distribution systems over, along and across the highways of the Counties of Jackson, Lafayette, Pettis, Johnson, Cass, Bates, Henry, Benton, St. Clair, Vernon, Cedar, Barton, Dade, Harrison, Mercer, Grundy and Daviess, and along such other routes as may be properly provided in said counties, and along private rights-of-way as may be secured by the applicant, all in the State of Missouri, with authority to furnish electric service to all persons in the area for which this certificate is granted and in conformity with the extension rules that the applicant, from time to time, may have on file with this Commission and in effect, such area being fully described on the map filed herein by the applicant, attached to its application and marked Exhibit "A-1", with the boundary line changed as shown by the testimony taken in the hearing, wherein the applicant amended

the boundary between it and the Kansas City Power & Light Company. The aforesaid map is hereby referred to, with the said correction, and made a part of this order. The authority herein granted, however, does not grant permission to serve within the corporate limits of any municipality unless the consent of the proper municipal authorities shall first have been obtained, and until a certificate of convenience and necessity for the operation in said municipal area shall have been secured from this Commission.

ORDERED: 2. That said electric transmission and power lines and all equipment connected therewith shall be constructed so as to conform to the specific rules and regulations contained in the National Electrical Safety Code, issued by the United States Bureau of Standards, and where said transmission lines cross the tracks of any railroad company, said crossing shall be constructed so as to conform to the specific rules and regulations contained in the Commission's General Order No. 24, issued August 17, 1925. Furthermore, that said applicant herein shall maintain and operate said transmission lines and all equipment connected therewith in a reasonably safe and adequate manner so as not to endanger the safety of the public or to interfere unreasonably with the service of other aerial lines, and shall give reasonable notice to any other utility whose service might be affected by any proposed construction or change; and that the Commission fully retain jurisdiction of the parties and the subject matter of this proceeding, on the evidence now before the Commission, for the purpose of making such further order or orders as may be necessary.

ORDERED: 3. Wherever said electric transmission lines may or do parallel aerial lines belonging to or operated by other companies or individuals or cross such line or lines or come in close proximity thereto so as to cause induction or other electrical interference, thereby making necessary changes in said line or lines or in the said line or lines of the



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applicant for the general benefit and safety of the public, the expense, if any accrued in making such changes shall be determined by an agreement between the parties operating such lines and the applicant, and in case of failure of the parties to reach such agreement in settlement thereof, the matter may be submitted to the Public Service Commission for arbitration and determination as provided for in Section 118 of the Original Act creating the Public Service Commission of this State, now Section 5241 of the Revised Statutes of Missouri for 1929.

ORDERED: 4. That before beginning the construction of any electrical power and transmission line in the territory herein designated and before a change is made in the location, phase or voltage of any electric line that may be in operation, the applicant shall give all other utilities, associations or persons whose lines are or may be affected by such change or construction at least 15 days' written notice, showing in sufficient detail what the proposed construction or change will be to enable competent representatives of those utilities, associations or persons to determine what action the particular utility or utilities, associations or persons may desire to take with reference thereto.

ORDERED: 5. That this order shall take effect ten days after the date hereof, and that the Secretary of the Commission shall forthwith serve on all parties interested herein, a certified copy of this report and order, and that the applicant and all other interested parties shall notify the Commission before the effective date of this order, in the manner prescribed by Section 25 of the Public Service Commission Law, (Sec. 5145, R. S. No. 1929), whether the terms of this order are accepted and will be obeyed.

BY THE COMMISSION,

*Mary Fidler*  
MARY FIDLER

ACTING SECRETARY.

James, Chr., Anderson, Boyer,  
Nortoni and Ferguson, CC. Concur.

Dated at Jefferson City, Missouri,  
this the 18th day of January, 1938.

Box No.17262	Case No. 9470	Territorial Service Boundary
Exhibit (maps)	Description	Dimension (inches) L x W
A-1	general map	45 x 27.5
A-2	Jackson County	22 x 17
A-3	Lafayette County	17 x 21.5
A-4	Pettis County	22 x 17
A-5	Johnson County	17 x 21.5
A-6	Cass County	17 x 22
A-7	Bates County	17 x 21.5
A-8	Henry County	17 x 22
A-9	Benton County	21 x 17
A-10	St. Clair County	17 x 22
A-11	Vernon County	17 x 22
A-12	Cedar County	17 x 22
A-13	Barton County	17 x 21.5
A-14	Dade County	17 x 21.5
A-15	Harrison County	22 x 17
A-16	Mercer County	20.5 x 17
A-17	Grundy County	22 x 17
A-18	Daviess County	22 x 17
A-19	Livingston County	17 x 20.5

A-1 shows the exact location of the lines delineating the territory in which the applicant seeks a certificate at this time, with the exception of Livingston County.

In Livingston County the applicant does not have authority from the county court to locate its lines therefore it does not include a request for a certificate of convenience and necessity for that county, but ask to have it as a matter of record where it should be expected to operate. It has a line in that area, the northwestern part of Livingston County.

#### Case Style

In the matter of the application of the Missouri Public Service Corporation for a blanket certificate of convenience and necessity, authorizing it to construct, operate, and maintain extensions to its electric transmission and distribution lines (exclusive of incorporated municipalities) in all or portions of Jackson, Lafayette, Pettis, Johnson, Cass, Bates, Henry, Benton, St. Clair, Vernon, Cedar, Barton, Dade, Harrison, Mercer, Grundy and Daviess Counties; and to authorize a proposed territorial boundary line in Livingston County; all within the State of Missouri; all of the territory and territorial boundary lines in the above mentioned Counties, being more fully shown and described on the maps and in the descriptions attached hereto, marked Exhibits A-1 to A-19, inclusive.

Report and Order dated January 18, 1938 and shall take effect ten days after the date hereof.

Supplemental Report and Order dated January 20, 1938 corrects applicant as a Delaware corporation.



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Exhibit A-2

DESCRIPTION OF BOUNDARY LINE

Jackson County

Beginning at the S.W. corner of Sec. 33, Twp. 47, Range 33, Jackson Co., and running north along the west side of Sections 33, 28, 21 and the south half of Sec. 16, Twp. 47, Range 33; thence east through the center of Sections 16 and 15 to the west side of Section 14; thence north to the N.W. corner of Sec. 14; thence east along the north side of Sections 14 and 13, Twp. 47, Range 33, and east along the north side of Sec. 18 and the west half of Section 17, Twp. 47, Range 32; thence north through the center of Sections 8 and 5, Twp. 47, Range 32, and through the center of Sections 32, 29, 20, 17, 8 and 5, Twp. 48, Range 32 to the north side of Sec. 32, Twp. 49, Range 32; thence east to within 1/4 mi. west of the N.E. corner of Sec. 33, Twp. 49, Range 32; thence north to a point 1/2 mi. north of the south line of Sec. 21, Twp. 49, Range 32; thence east on the east and west center lines of Sections 21, 22, 23, and 24, Twp. 49, Range 32, and through the center of Sections 19, 20, 21, 22, 23 and 24, Twp. 49, Range 31, and through the center of Sections 19, 20, 21 and 22 to a point in said Sec. 22, 1/4 mi. more or less east of the west line of Sec. 22, Twp. 49, Range 30; thence north through Sections 22, 15 and 10 to the north line of said Sec. 10, Twp. 49-N, Range 30; thence west along the north line of said Sec. 10, 1/8 mi. more or less; thence north 1/4 mi. more or less in Sec. 3, Twp. 49-N, Range 30; thence west in said Sec. 3 to the west line of Sec. 3; thence north on the west line of Sec. 3 to the N.W. corner of Sec. 3, Twp. 49, Range 30; thence continuing north along the west line of Sections 34, 27, 22, 15, 10 and 3, Twp. 50, Range 30; thence continuing north along the west line of Sec. 34 and 27, Twp. 41, Range 30 to the Missouri River

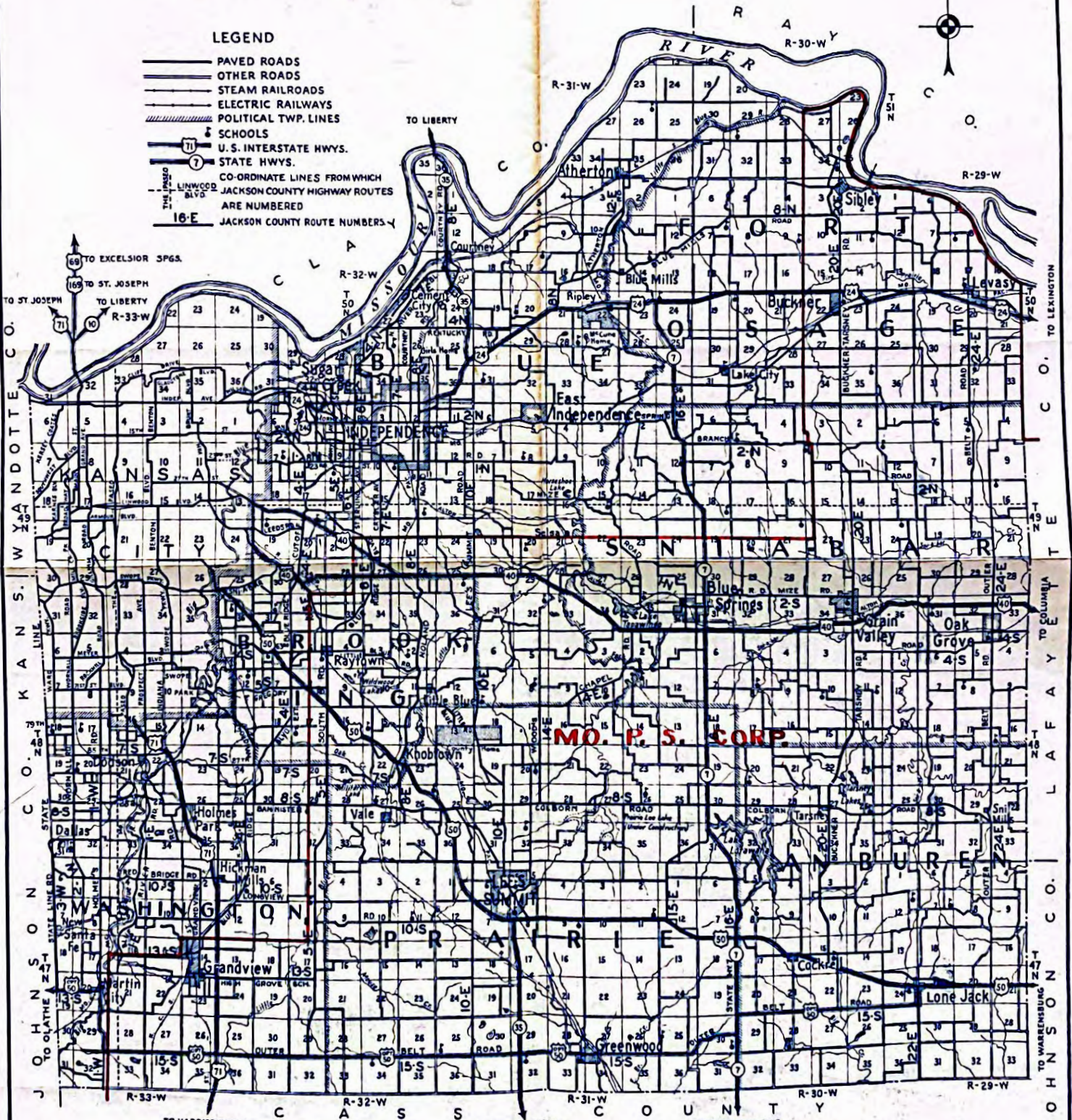
# JACKSON COUNTY

PROPOSED TERRITORIAL BOUNDARY LINE.

## - MISSOURI -

### LEGEND

- PAVED ROADS
- OTHER ROADS
- STEAM RAILROADS
- ELECTRIC RAILWAYS
- POLITICAL TWP. LINES
- SCHOOLS
- U. S. INTERSTATE HWYS.
- STATE HWYS.
- CO-ORDINATE LINES FROM WHICH JACKSON COUNTY HIGHWAY ROUTES ARE NUMBERED
- JACKSON COUNTY ROUTE NUMBERS.



## DESCRIPTION OF BOUNDARY LINE

Lafayette County

9470

Exhibit A-3

All of that territory laying South and West of a line described as follows:

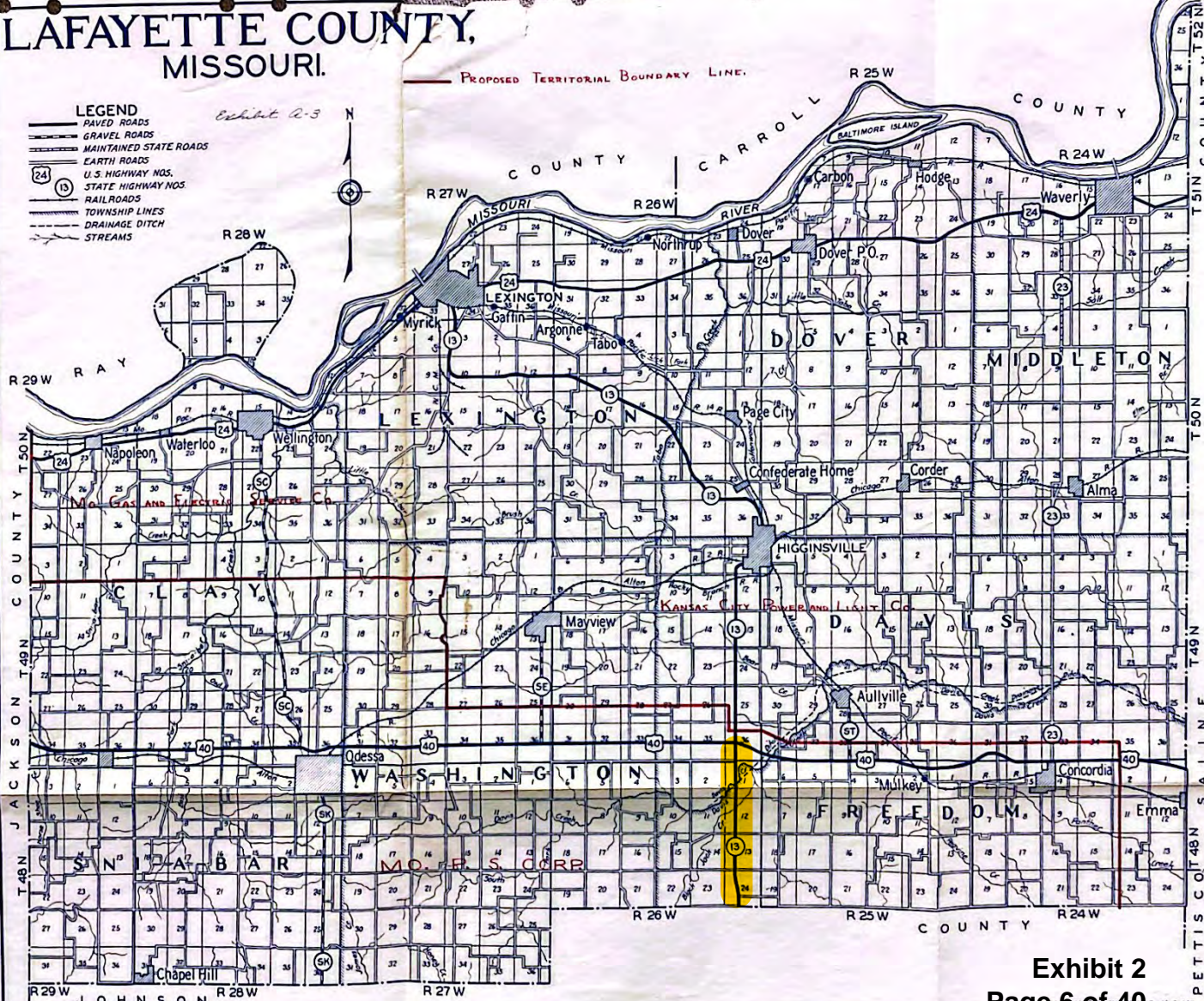
Beginning at a point on the Northwest corner of Section 10, Township 49 North, Range 29 West; thence East along the North boundary lines of Sections 10, 11, and 12 in above said Township and Range, and continuing East along the North boundary lines of Sections 7, 8, 9, 10, 11, and 12, Township 49 North, Range 28 West, and continuing East along the North boundary lines of Sections 7, 8, and 9, Township 49 North, Range 27 West to the intersection of a county road on or near the Northeast corner of Section 9 in above said Township and Range; thence South along said road through Sections 9 and 16 in above said Township and Range to the Southeast corner of said Section 16; thence South along the East boundary line of Section 21, and continuing South along the East boundary line of Section 28 in above said Township and Range to a point one-half ( $\frac{1}{2}$ ) mile, more or less, South of the North boundary line of said Section 28; thence East through the centers of Sections 27, 28, and 25 in above said Township and Range, and continuing East through Sections 30, 29, 28, 27, and 26 in Township 49 North, Range 26 West, and continuing East through Section 25 in above said Township and Range for a distance of approximately one-eighth ( $\frac{1}{8}$ ) of a mile, more or less, East of the East boundary line of said Section 26; thence South through Section 25 in above said Township and Range along the line one-eighth ( $\frac{1}{8}$ ) mile, more or less, East of the West boundary line of said Section 25, and continuing South into Section 36 in above said Township and Range for a distance of one-fourth ( $\frac{1}{4}$ ) mile, more or less; thence East through said Section 36 to the East boundary line thereof; thence in a Southeasterly direction through Section 31, Township 49 North, Range 25 West to a point on the East and West center line of Section 32 in above said Township and Range, and continuing East along the center lines of Sections 32, 33, 34, 35, and 36 in above said Township and Range, and continuing East through the center lines of Sections 31, 32, 33, and 34, Township 49 North, Range 24 West, and continuing East through Section 35 in above said Township and Range to a point one-fourth ( $\frac{1}{4}$ ) mile East of the West boundary line of said Section 35; thence South along a line one-fourth ( $\frac{1}{4}$ ) mile East of the West boundary line of said Section 35, in above said Township and Range, and continuing South along said line through Sections 2, 11, 4, 14, and 23, Township 48 North, Range 24 West to the Lafayette County line.

# LAFAYETTE COUNTY, MISSOURI.

PROPOSED TERRITORIAL BOUNDARY LINE.

- LEGEND**
- PAVED ROADS
  - GRAVEL ROADS
  - MAINTAINED STATE ROADS
  - EARTH ROADS
  - U.S. HIGHWAY NOS.
  - STATE HIGHWAY NOS.
  - RAILROADS
  - TOWNSHIP LINES
  - DRAINAGE DITCH
  - STREAMS

*Exhibit A-3*



9470

Exhibit A-4

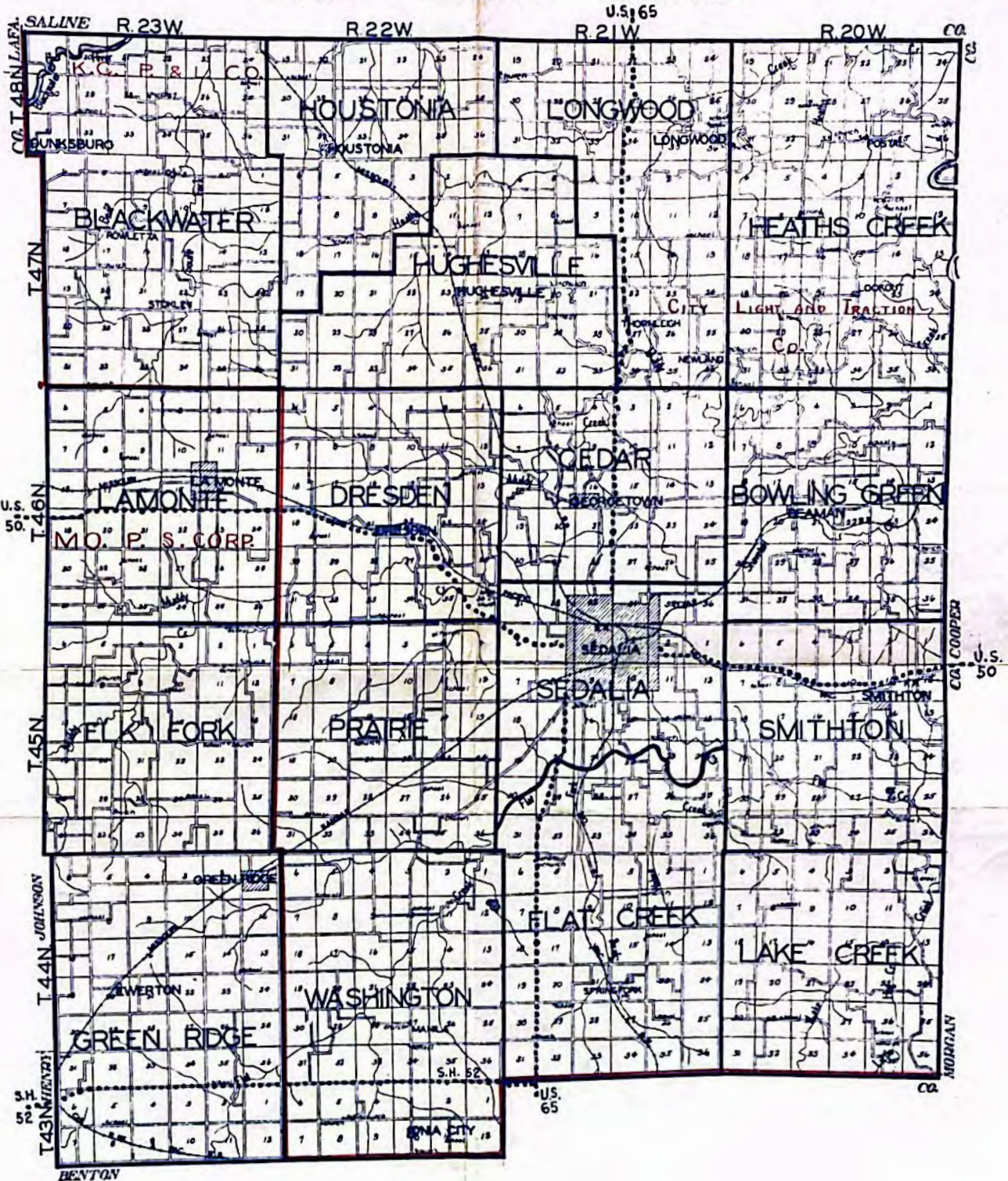
DESCRIPTION OF BOUNDARY LINE

Pettis County

Beginning at the Northwest corner of Section 6, Township 46 North, Range 23 West; thence East along the North boundary lines of Sections 6, 5, 4, 3, 2, and 1 in above said Township and Range to the Northeast corner of said Section 1; thence South along the East boundary lines of Sections 1, 12, 13, 24, 25, and 36, all within the above said Township and Range, and continuing South along the East boundary lines of Sections 1, 12, 13, 24, 25, and 36, Township 45 North, Range 23 West to the Southeast corner of said Section 36; thence East one-eighth ( $1/8$ ) mile, more or less, to the Northeast corner of Section 1, Township 44 North, Range 23 West; thence South along the East boundary lines of Sections 1, 12, 13, 24, 25, and 36 in above said Township and Range, and continuing South along the East boundary lines of Sections 1 and 12 in Township 43 North, Range 23 West to the Southeast corner of said Section 12; thence East along the South boundary lines of Sections 7, 8, 9, 10, 11, and 12, Township 43 North, Range 22 West to the Southeast corner of said Section 12; thence North along the East boundary lines of Sections 12 and 1 in the above said Township and Range to the Northeast corner of said Section 1; thence East along the South boundary lines of Sections 31, 32, 33, 34, 35, and 36, Township 44 North, Range 21 West, and continuing East along the South boundary lines of Sections 31, 32, 33, 34, 35, and 36, Township 44 North, Range 20 West to the Southeast corner of said Section 36.



# PETTIS COUNTY MISSOURI



9470

*Exhibit A-5*

DESCRIPTION OF BOUNDARY LINE

Johnson County

All of that territory contained within the entire County.



## DESCRIPTION OF BOUNDARY LINE

Cass County

9470

Exhibit A-6

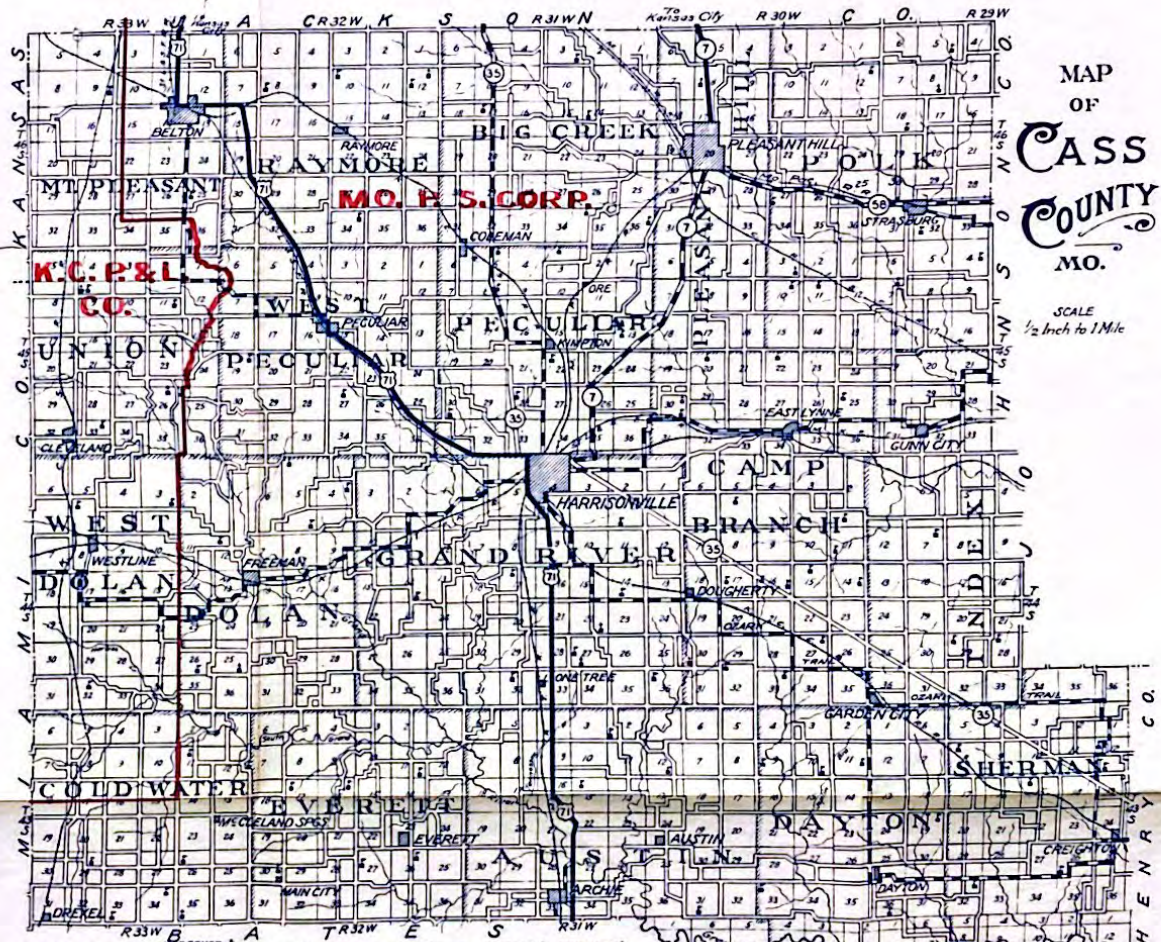
Beginning at a point on the State Line between Missouri and Kansas, 1/2 mi. south of the N.W. corner of Sec. 18, Twp. 43-N, Range 33-W, Cass County; thence east through the center of Sections 18, 17, 16 and 15 to the east line of Sec. 15; thence north along the east line of Sections 15, 10 and 3 to the N.E. corner of said Sec. 3, all in Twp. 43-N, Range 33-W; thence north along the east line of Sections 34, 27, 22, 15, 10 and 3, to the N.E. corner of said Sec. 3, all in Twp. 44-N, Range 33-W; thence east along the north line of Sec. 2, Twp. 44-N, Range 33-W, to the west line of Sec. 36, Twp. 45-N, Range 33-W; thence north along the west line of Sections 36 and 25 to the north line of said Sec. 25, Twp. 45-N, Range 33-W; thence east along the north line of Sec. 25, 1/4 mi. more or less to the center line of a creek; thence northeasterly along said creek through Sections 24, 13 and 12 to a point on the east line of Sec. 12, 1/2 mi. more or less north of the S.E. corner of Section 12, all in Twp. 45-N, Range 33-W; thence in a northeasterly direction along said creek through Sec. 7, Twp. 45, Range 32-W, to a point on the north line of Sec. 7, 3/8 mi. more or less east of the west line of said Sec. 7; thence in a northwesterly direction through Sec. 6, Twp. 45, Range 32 and along said creek to a point on the west line of said Sec. 6, 1/2 mi. more or less north of the S.W. corner of Sec. 6; thence northwesterly along said creek through Sec. 1, Twp. 45, Range 33-N, to a point on the north line of Sec. 1, 3/8 mi. more or less east of the west line of Sec. 1; thence northwesterly along said creek through Sec. 36, Twp. 46, Range 33-W to a point in Sec. 36, 1/4 mi more or less east of the west line of Sec. 36 and 1/4 mi. more or less south of the north line of Sec. 36, Twp. 46, Range 33-W; thence west through Sections 36, 35 and 34 to a point in Sec. 34, Twp. 46-N, Range 33-W, 1/4 mi. east and 1/4 mi. south of the N.W. corner of Sec. 34; thence north through Sections 34, 27, 22, 15, 10 and 3, Twp. 46-N, Range 33-W to a point on the north line of said Sec. 3, 1/4 mi. east of the northwest corner of said Sec. 3; thence west 1-1/4 mi. to the N.W. corner of Sec. 4, Twp. 46-N, Range 33-W, Cass County.

Not plotted on Map A-6

# MAP OF CASS COUNTY MO.

SCALE 1/2 inch to 1 Mile

Sheet A-6



PAVED ROADS — GRAVEL ROADS — ROADS — RAILROADS — SCHOOLS & CHURCHES & CREEKS & STREAMS <<<<<< STATE HIGHWAYS ⑦ U.S. HIGHWAYS ①

Exhibit 2

9470

Exhibit A-7

DESCRIPTION OF BOUNDARY LINE

Bates County

All of that territory in Bates County laying generally East and North of a line described as beginning at the Southwest corner of Section 23, Township 38 North, Range 32 West; thence North along the West boundary lines of Sections 23, 14, 11, and 2, all contained within the above said Township and Range, and continuing North along the West boundary line of Section 35, Township 39 North, Range 32 West, and continuing North along the West boundary lines of Sections 26, 23, 14, 11, and 2, in above said Township and Range to the Northwest corner of said Section 2; thence West along the remainder of the South boundary line of Section 36, Township 40 North, Range 32 West and continuing West along the South boundary lines of Sections 35, 34, 33, 32, and 31, all in above said Township and Range, and continuing West along the South boundary line of Section 36, Township 40 North, Range 33 West, and continuing West along the South boundary lines of Sections 35, 34, 32, and 31 to a point located on the South boundary line of Section 31, which point is located on the Missouri-Kansas State line; thence in a Northwesterly direction and along the Missouri-Kansas State line through Sections 31, 30, 19, 18, 7, and 6 in above said Township and Range, and continuing North along the Missouri-Kansas State line through Section 31, Township 41 North, Range 33 West, and continuing Northwesterly through Sections 30, 19, 18, 7, and 6, in above said Township and Range, and continuing Northwesterly along the Missouri-Kansas State line through Section 31, Township 42 North, Range 33 West, and continuing Northwesterly along the Missouri-Kansas State line through Sections 30, 19, 18, 7, and 6 to a point on the Missouri-Kansas State line at the intersection of the Bates-Cass County line with the above said State line.

# BATES CO. MISSOURI



Exhibit A-7

## LEGEND

- PAVED ROADS
- GRAVELED ROADS
- STATE OR COUNTY ROADS NOT HIGHLY IMPROVED
- ROADS
- U.S. INTERSTATE HIGHWAY
- STATE HIGHWAY
- RAILROADS
- DRAINAGE DISTRICT LINE
- MUNICIPAL TWP LINE
- STREAMS
- SCHOOLS

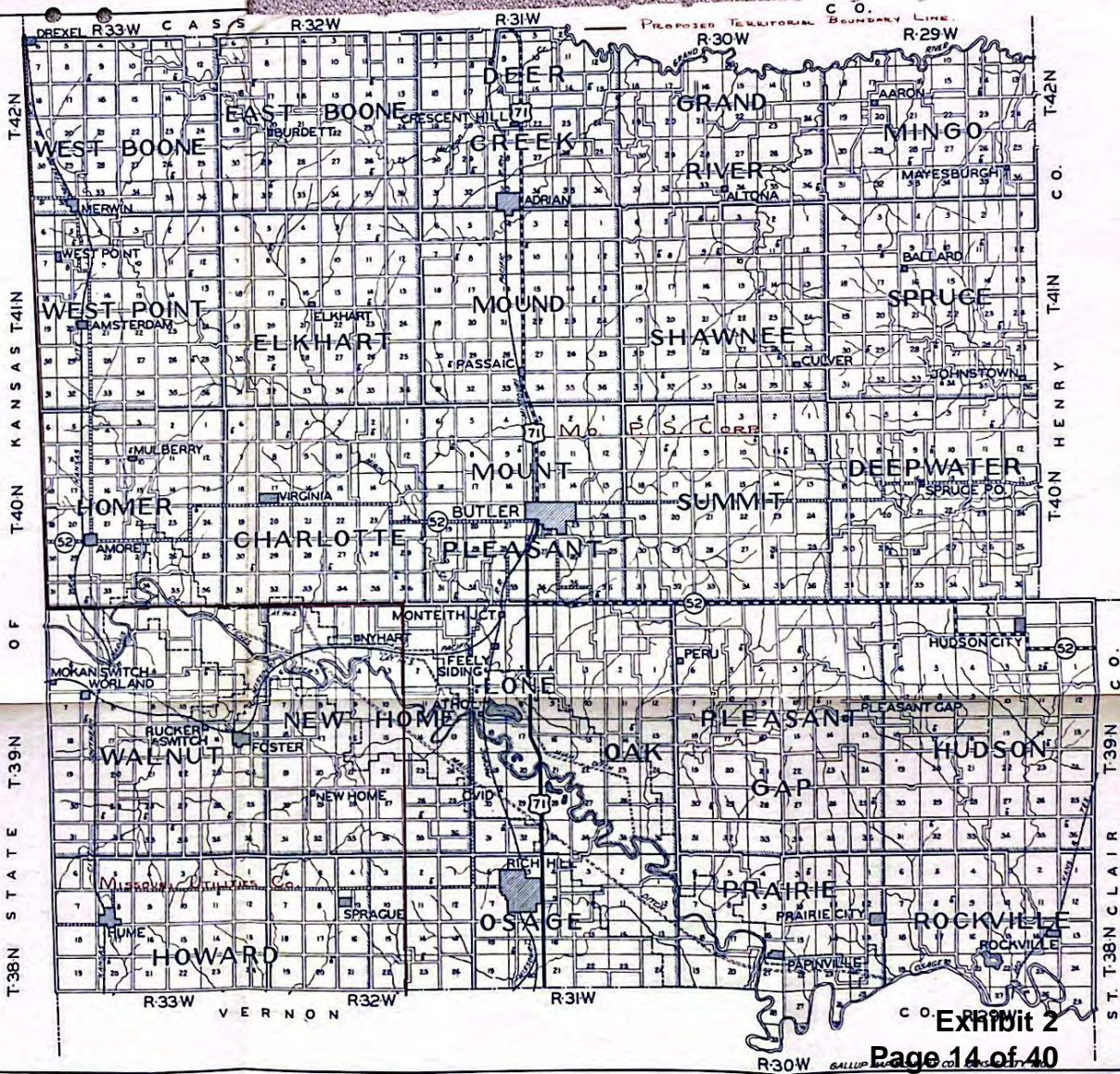


Exhibit 2

## DESCRIPTION OF BOUNDARY LINE

Henry County

9470  
Exhibit A-8

All of that territory in Henry County laying outside of a line described as beginning at the Northwest corner of Section 36, Township 42 North, Range 27 West; thence South along the West boundary line of said Section 36, and continuing South along the West boundary line of Section 1, Township 41 North, Range 27 West to the Grand River, which distance is one-half ( $\frac{1}{2}$ ) mile, more or less, and continuing Southeasterly along the meandering course of said Grand River through Sections 1 and 12, Township 41 North, Range 27 West, and continuing along the course of said river through Sections 7, 18, 17, 16, 21, 22, 23, 14, 26, 24, and 25 in Township 41 North, Range 26 West, then continuing along the course of said river through Section 30, Township 41 North, Range 25 West to the South boundary line of said Section 30, which point is one-third ( $\frac{1}{3}$ ) mile, more or less, East of the Southeast corner of said Section 30; thence East along the South boundary lines of Sections 30, 29, 28, 27, 26, and 25, Township 41 North, Range 25 West, and continuing East along the South boundary line of Section 30, Township 41 North, Range 24 West to the Southeast corner of said Section 30; thence North along the East boundary line of said Section 30 and Sections 19, 18, 7, and 6 in above said Township and Range, and continuing North along the East boundary lines of Sections 31 and 30, Township 42 North, Range 24 West to the Northeast corner of said Section 30; thence West along the North boundary line of said Section 30 in above said Township and Range, and continuing West along the North boundary lines of Sections 25, 26, 27, 28, and 29, Township 42 North, Range 25 West to the Northwest corner of said Section 29; thence South along the West boundary line of said Section 29 to the Southwest corner thereof; thence West along the North boundary line of Section 31 in above said Township and Range to the Northwest corner of said Section 31; thence South along the West boundary line of said Section 31 in above said Township and Range to the Southwest corner thereof; thence West along the North boundary lines of Sections 1 and 2, Township 41 North, Range 26 West, and continuing West along the North boundary line of Section 3 in above said Township and Range for a distance of one-fourth ( $\frac{1}{4}$ ) mile, more or less, West of the Northeast corner of said Section 3; thence North along a line one-fourth ( $\frac{1}{4}$ ) mile, more or less, West of the East boundary line of Section 34, Township 42 North, Range 26 West to the St. Louis-San Francisco Railroad right-of-way; thence in a Northwesterly direction to the North boundary line of said Section 34, thence West along the North boundary line of said Section 34, and continuing West along the North boundary line of Sections 33, 32, and 31 in above said Township and Range, and continuing West along the North boundary line of Section 36, Township 42 North, Range 27 West to the point of beginning.

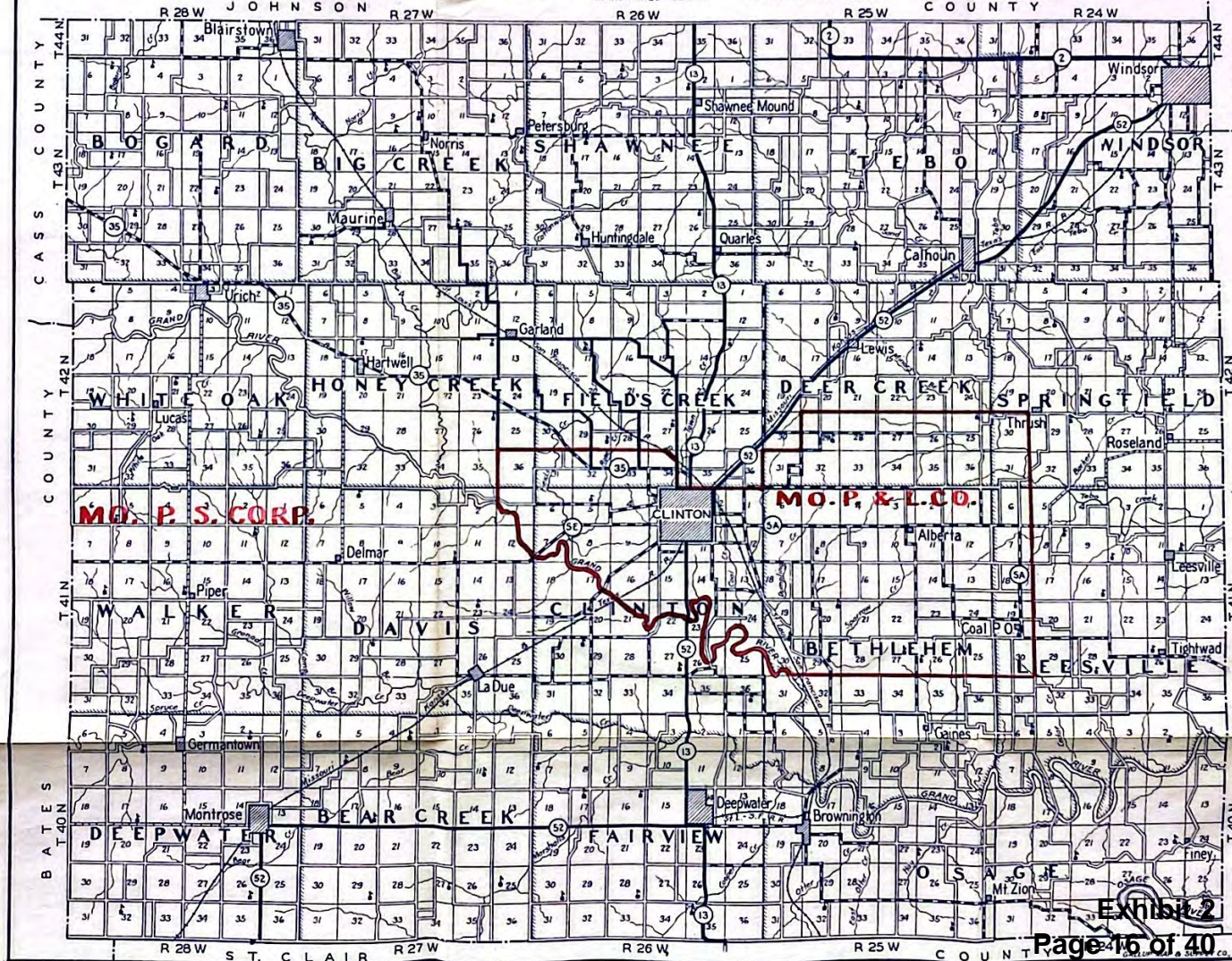


# HENRY COUNTY, MISSOURI

PROPOSED TERRITORIAL BOUNDARY LINE.  
CONCRETE & OIL MAT ROADS  
OIL & GRAVEL ROADS  
MAINTAINED ROADS

EARTH ROADS  
STATE HIGHWAY NOS  
RAILROADS

MUNICIPAL TWP LINES  
STREAMS  
SCHOOLS



*Blairtown*

Exhibit 2

PETTIS CO.  
COUNTY  
BENTON

9470

*Exhibit A-9*

DESCRIPTION OF BOUNDARY LINE

Benton County

All of the territory contained within Benton County, and the territorial boundary lines between the Missouri Public Service Corporation and other electric utilities, whose territory lies contiguous to that of the Missouri Public Service Corporation, shall be the Benton County line.

# BENTON COUNTY MISSOURI

CITY LIGHT AND TRACTION Co.

PETTIS R-21-W

65 U.S. HIGHWAY NUMBER

-LEGEND-

52 STATE HIGHWAY NUMBER

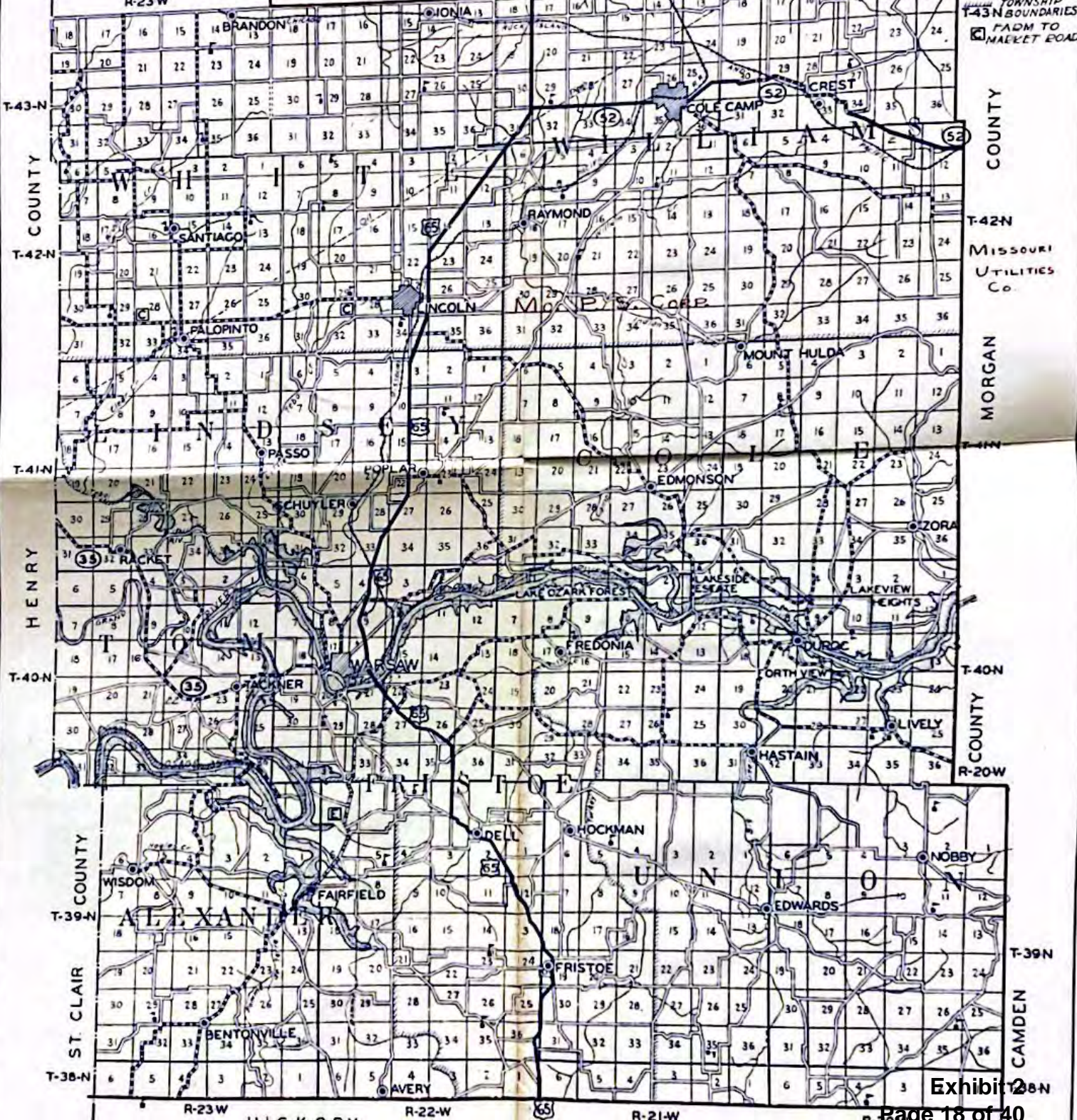
COUNTY R-20-W

- GRAVEL ROAD
- GRADED ROAD
- UNIMPROVED ROAD
- RAILROAD
- SCHOOLS
- STREAMS
- TOWNSHIP BOUNDARIES
- FARM TO MARKET ROAD

Proposed Territorial Boundary Line.

PETTIS R-23-W

COUNTY R-22-W



9470

Exhibit A-10

DESCRIPTION OF BOUNDARY LINE

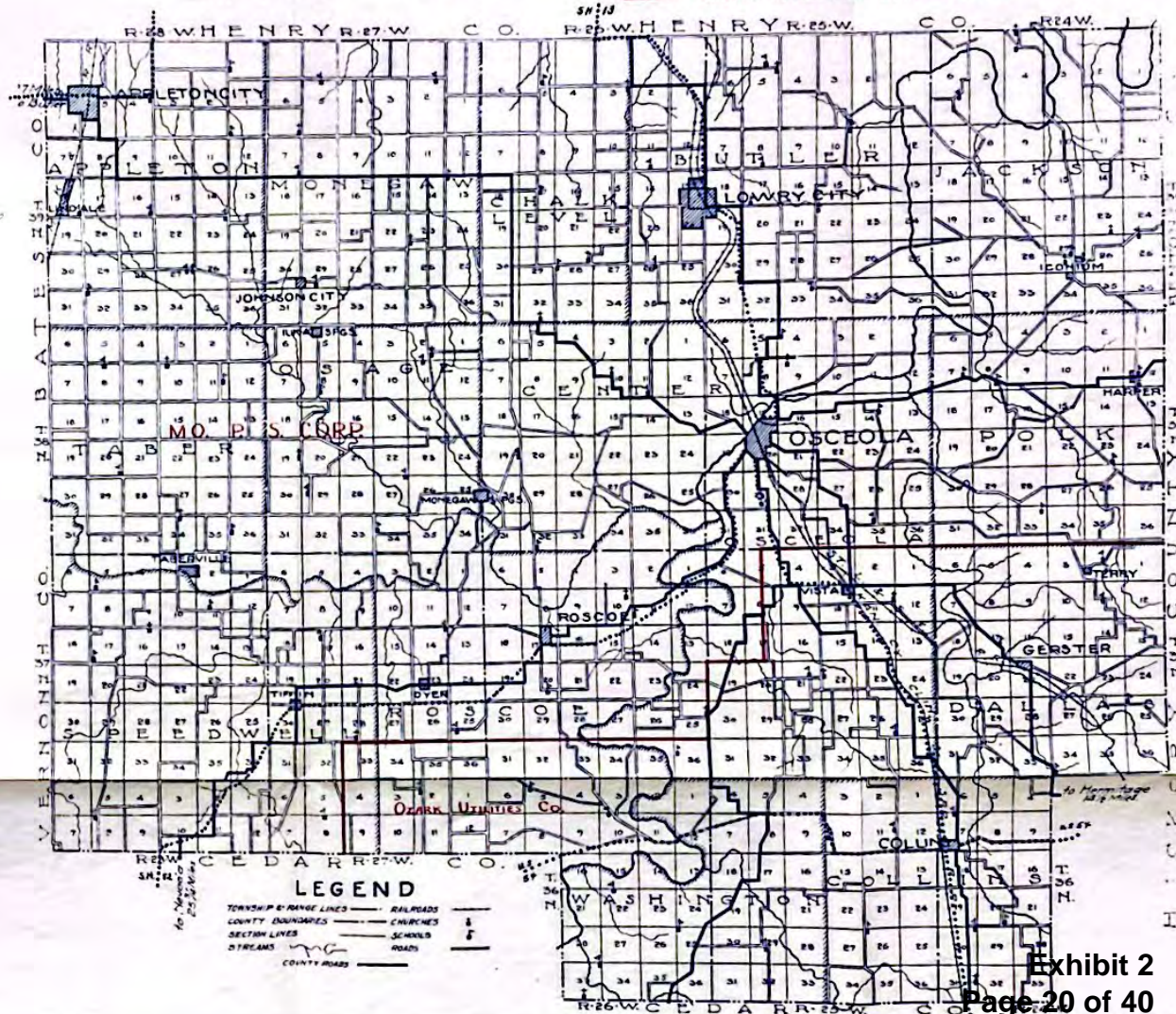
St. Clair County

All of that territory in St. Clair County laying North and West of a line described as:

Beginning at the Southeast corner of Section 8, Township 36 North, Range 27 West; thence North along the East boundary lines of Section 8 and 5 in above said Township and Range, and continuing North along the East boundary line of Section 32, Township 37 North, Range 27 West to the Northeast corner of said Section 32; thence East along the South boundary lines of Sections 28, 27, 26, and 25 in above said Township and Range, and continuing East along the South boundary lines of Sections 30, 29, 28, 27, 26, and 25, Township 35 North, Range 26 West to the Southeast corner of said Section 25; thence North along the East boundary lines of said Sections 25 and 24 in the above Township and Range to the Northeast corner of said Section 24; thence East along the South boundary line of Section 18, Township 37 North, Range 25 West, and continuing East along the South boundary line of Section 17 to a point one-half ( $\frac{1}{2}$ ) mile East of the Southwest corner of said Section 17; thence North through the centers of Sections 17, 8, and 5 in Township 37 North, Range 25 West to a point on the North boundary line of Section 5, one-half ( $\frac{1}{2}$ ) mile East of the Northwest corner of said Section 5; thence East along the South boundary lines of Sections 32, 33, 34, 35, and 36, Township 38 North, Range 25 West, and continuing East along the South boundary lines of Sections 31, 32, 33, 34, 35, and 36, Township 38 North, Range 24 West.

# ST. CLAIR COUNTY MISSOURI

PROPOSED TERRITORIAL BOUNDARY LINE.



## LEGEND

- TOWNSHIP & RANGE LINES ———
- COUNTY BOUNDARIES ———
- SECTION LINES ———
- STREAMS ———
- COUNTY ROADS ———
- RAILROADS ———
- CHURCHES ———
- SCHOOLS ———
- ROADS ———

Exhibit 2

Page 20 of 40

9470

Exhibit A-11

DESCRIPTION OF BOUNDARY LINE

Vernon County

All of that territory in Vernon County laying generally East of a line described as beginning at a point on the South boundary line of Section 33, Township 34 North, Range 33 West, which point is one-half (1/2) mile, more or less, East of the Southeast corner of said Section 33; thence East along the South boundary line of said Section 33 to the Southwest corner of Section 34 in above said Township and Range; thence North along the West boundary line of Sections 34, 27, 22, 15, 10, and 3, in above said Township and Range to the Northwest corner of said Section 3; thence West along the South boundary line of Section 35, Township 35 North, Range 33 West to the Southwest corner of said Section 35; thence North along the West boundary lines of Sections 35, 26, 23, 14, 11, and 2, all in above said Township and Range, and continuing North along the West boundary line of Section 35, Township 36 North, Range 33 West to the Northwest corner of said Section 35; thence East along the North boundary lines of Sections 35 and 36 in above said Township and Range to the Northeast corner of said Section 36; thence North along the East boundary line of Section 30, Township 36 North, Range 32 West, and continuing North along the West boundary line of Sections 19, 18, 7, and 6 in above said Township and Range, and continuing North along the West boundary line of Section 31, Township 37 North, Range 32 West, and continuing North along the West boundary lines of Sections 30, 19, 18, 7, and 6, in above said Township and Range, and continuing West along the North boundary line of Section 31, Township 38 North, Range 32 West to the Northwest corner of said Section 31; thence East along the North boundary lines of Sections 31, 32, 33, and 34 in above said Township and Range to the Northeast corner of Section 34; thence North along the West boundary line of Section 26 in above said Township and Range, and ending at the Northwest corner of said Section 26.

# VERNON COUNTY MISSOURI

PROPOSED TERRITORIAL BOUNDARY LINE.

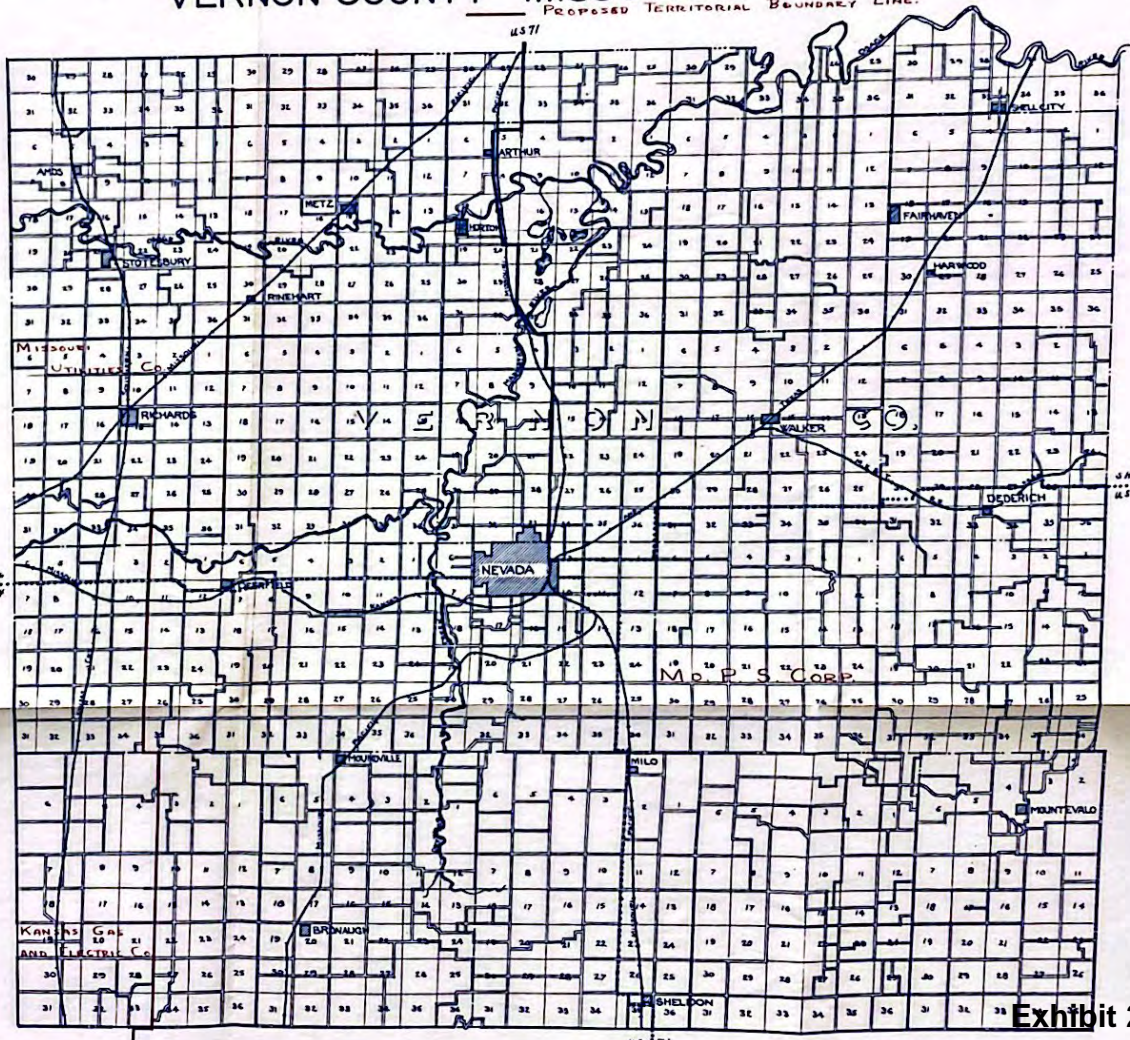


Exhibit A-1

S.W. 1/4  
44 27

S.W. 1/4  
44 54

45 77

Exhibit 2  
Page 22 of 40

9470  
Exhibit A-12

DESCRIPTION OF BOUNDARY LINE

Cedar County

All of that territory in Cedar County laying West of a line beginning at the Southeast corner of Section 19, Township 33 North, Range 27 West; thence North along the East boundary lines of Sections 19, 18, 7, and 6 in above said Township and Range, and continuing North along the East boundary lines of Sections 31, 30, 19, 18, 7, and 6, Township 34 North, Range 27 West to the Northeast corner of said Section 6; thence West one-quarter ( $\frac{1}{4}$ ) mile, more or less, to the Southeast corner of Section 32, Township 35 North, Range 27 West; thence North along the East boundary lines of Sections 32, 29, 20, 17, 8, and 5 in above said Township and Range, and continuing North along the East boundary lines of Sections 32, 29, 20, and 17, Township 36 North, Range 27 West to the Northeast corner of said Section 17.





9470

DESCRIPTION OF BOUNDARY LINE

Exhibit A-13

Barton County

Beginning at a point on the North boundary line of Section 4, one-half ( $\frac{1}{2}$ ) mile East of the Northwest corner of said Section 4, Township 33 North, Range 33 West; thence South through the center of said Section 4, and continuing South through Sections 9, 16, 21, 29, and 33 to a point on the South boundary line of said Section 33, one-half ( $\frac{1}{2}$ ) mile East of the Southwest corner of said Section 33, all contained within the above said Township and Range; thence West along the South boundary lines of the said Sections 33, 32, and 31 in the above said Township and Range to the Missouri-Kansas state line, which point is on or near the Northwest corner of Section 6, Township 32 North, Range 33 West; thence South along the state line and along the West boundary lines of Sections 6 and 7; thence to the Southwest corner of said Section 7; thence East along the South boundary lines of Sections 7 and 8 to a point on the South boundary line of Section 9, one-half ( $\frac{1}{2}$ ) mile East of the Southwest corner of said Section 9; thence South through the centers of Sections 16, 21, 28, and 33, all contained within the above said Township and Range, and continuing South through the center of Section 4, Township 31 North, Range 33 West, and continuing South into Section 9 for a distance of one-half ( $\frac{1}{2}$ ) mile South of the North boundary line of said Section 9; thence East through the centers of said Section 9 and Sections 10, 11, and 12 in above said Township and Range, and continuing East through the centers of Sections 7, 8, 9, 10, 11, and 12, Township 31 North, Range 32 West, and continuing East through the centers of Sections 7, 8, 9, 10, 11, and 12, Township 31 North, Range 31 West, and continuing East through the centers of Sections 7, 8, 9, 10, 11, and 12, Township 31 North, Range 30 West, and continuing East through the centers of Sections 7, 8, 9, 10, and 11, Township 31 North, Range 29 West.



9470

Exhibit A - 14

DESCRIPTION OF BOUNDARY LINE

Dade County

That territory in Dade County laying North and West of a line described as:

Beginning at a point one-half ( $\frac{1}{2}$ ) mile North of the Southwest corner of Section 12, Township 31 North, Range 29 West; thence East through the center of said Section 12 and continuing East through the center of Sections 7, 8, 9, 10, 11, and 12, all in Township 31 North, Range 28 West, and continuing East through Section 7, Township 31 North, Range 27 West to a point located one-half ( $\frac{1}{2}$ ) mile North of the Southeast corner of said Section 7; thence North along the East boundary line of said Section 7 and Section 6, all contained within the above said Township and Range, and continuing North along the East boundary lines of Sections 31, 30, 19, 18, 7, and 6, Township 32 North, Range 27 West, and continuing North along the East boundary lines of Sections 31 and 30 in Township 33 North, Range 27 West to the Northwest corner of said Section 30, which point is on or near the North boundary line of Dade County.

# DADE COUNTY MISSOURI

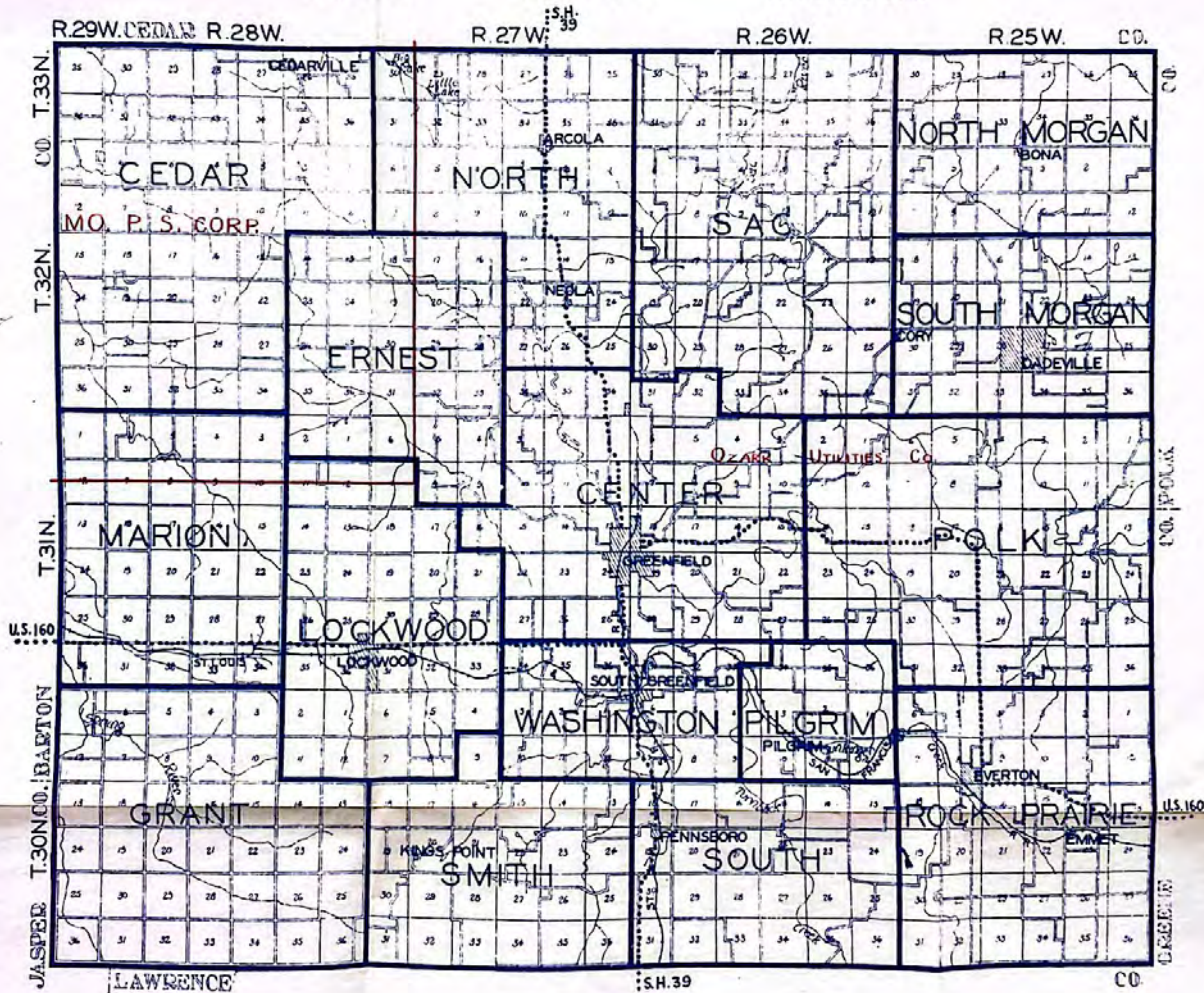


Exhibit 2

9470

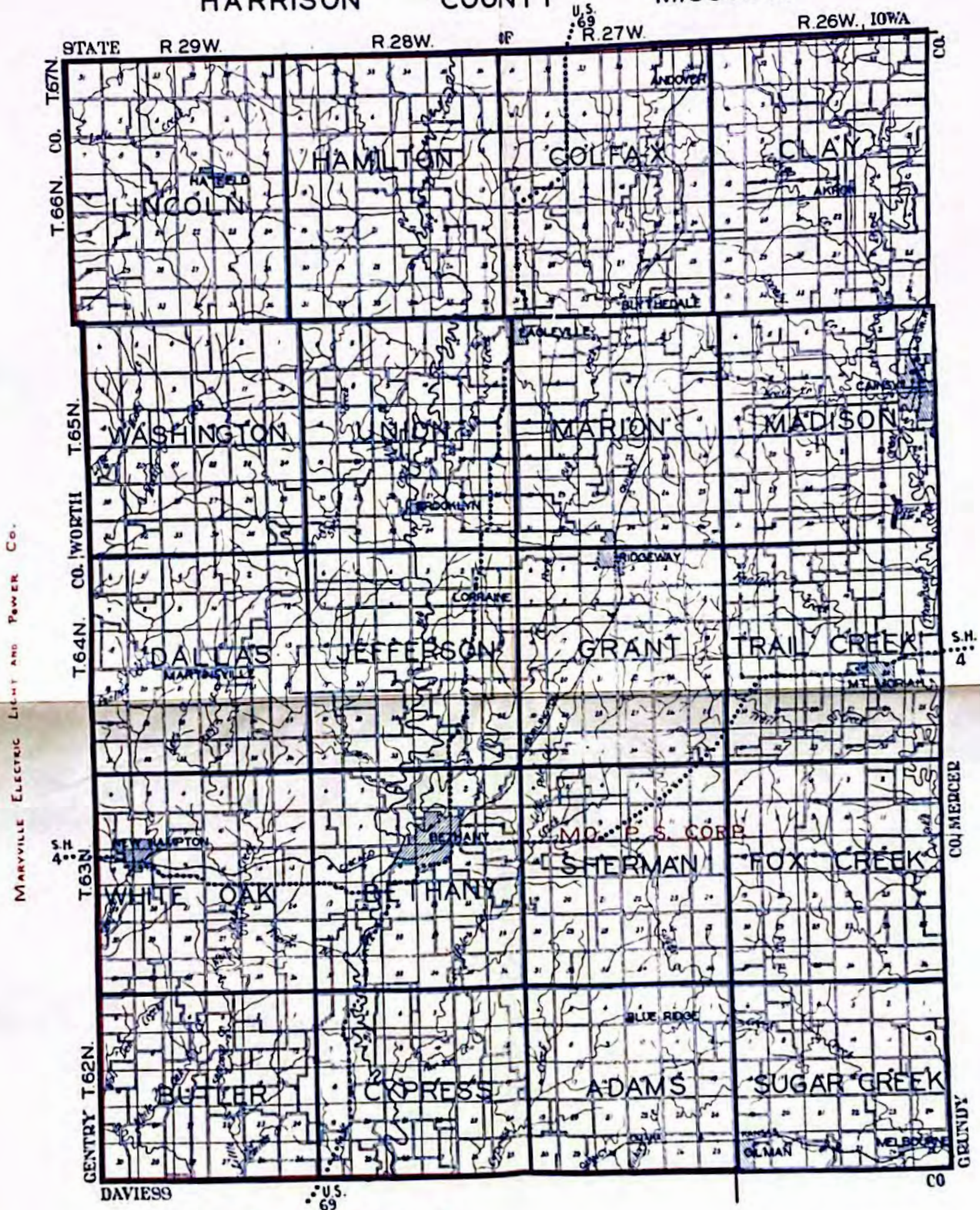
Exhibit A-15

DESCRIPTION OF BOUNDARY LINE

Harrison County

The territory of the Missouri Public Service Corporation shall include all of Harrison County. The territorial boundary line between the Missouri Public Service Corporation and other electric public utilities begins at the Southeast corner of Section 25, Township 62 North, Range 27 West; thence West along the remainder of the South boundary line of Harrison County and ending at the Southwest corner of Section 30, Township 62 North, Range 29 West; thence North along the entire West boundary line of Harrison County and ending at the Northwest corner of Section 31, Township 67 North, Range 29 West; thence East along the entire North boundary line of Harrison County and ending at a point on the East boundary line of Harrison County, which point is located approximately one-quarter ( $1/4$ ) mile, more or less, North of the Southeast corner of Section 25, Township 67 North, Range 26 West.

# HARRISON COUNTY MISSOURI



MARVILLE ELECTRIC LIGHT AND POWER CO.

Mo. Power and Light Co.

## DESCRIPTION OF BOUNDARY LINE

Mercer County

9470  
Exhibit A-16

All of that territory laying generally West of a line described as beginning at the Southeast corner of Section 12, Township 63 North, Range 24 West, thence North along the East boundary line of said Section 12, Township 63 North, Range 24 West, and continuing North along the East boundary line of Section 1 in above said Township and Range, and continuing North along the East boundary line of Section 36, Township 64 North, Range 24 West, and continuing North along the East boundary lines of Sections 25, 24, and 13 to the Northeast corner of said Section 13; thence West along the North boundary lines of Sections 13 and 14 to the Northwest corner of said Section 14; thence North along the East boundary lines of Sections 10 and 3, all in above said Township and Range; and continuing North along the East boundary line of Section 34, Township 65 North, Range 24 West to the Northeast corner of said Section 34; thence West along the North boundary line of Section 34 to a point on the North boundary line, which point is located one-eighth (1/8) mile, more or less, West of the Northeast corner of said Section 34 and more generally described as the East corporate limits of the City of Princeton; thence due North through Section 27 for a distance of one-quarter (1/4) mile, more or less, and along a line more generally described as the East corporate limits of the City of Princeton; thence East for a distance of one-eighth (1/8) mile, more or less, to a point on the East boundary line of said Section 27, which point is located one-quarter (1/4) mile, more or less, North of the Southeast corner of said Section 27; thence North along the East boundary line of Sections 27, 22, 19, and 10, Township 65 North, Range 24 West to the Northeast corner of Section 10 in above said Township and Range; thence West along the North boundary lines of Sections 10 and 9 in above said Township and Range to the Northwest corner of said Section 9; thence North along the East boundary line of Section 5 in above said Township and Range to the Northeast corner of said Section 5; thence West along the North boundary line of said Section 5 to the Southeast corner of Section 32, Township 66 North, Range 24 West; thence North along the East boundary lines of Sections 32, 29, 20, 17, 8, and 5 in above said Township and Range, and continuing North along the East boundary line of Section 32, Township 67 North, Range 24 West, and continuing North along the East boundary line of Section 29 in above said Township and Range for a distance of approximately one-half (1/2) mile and more generally described as the Missouri-Iowa State line; thence West through the centers of



DESCRIPTION OF BOUNDARY LINE

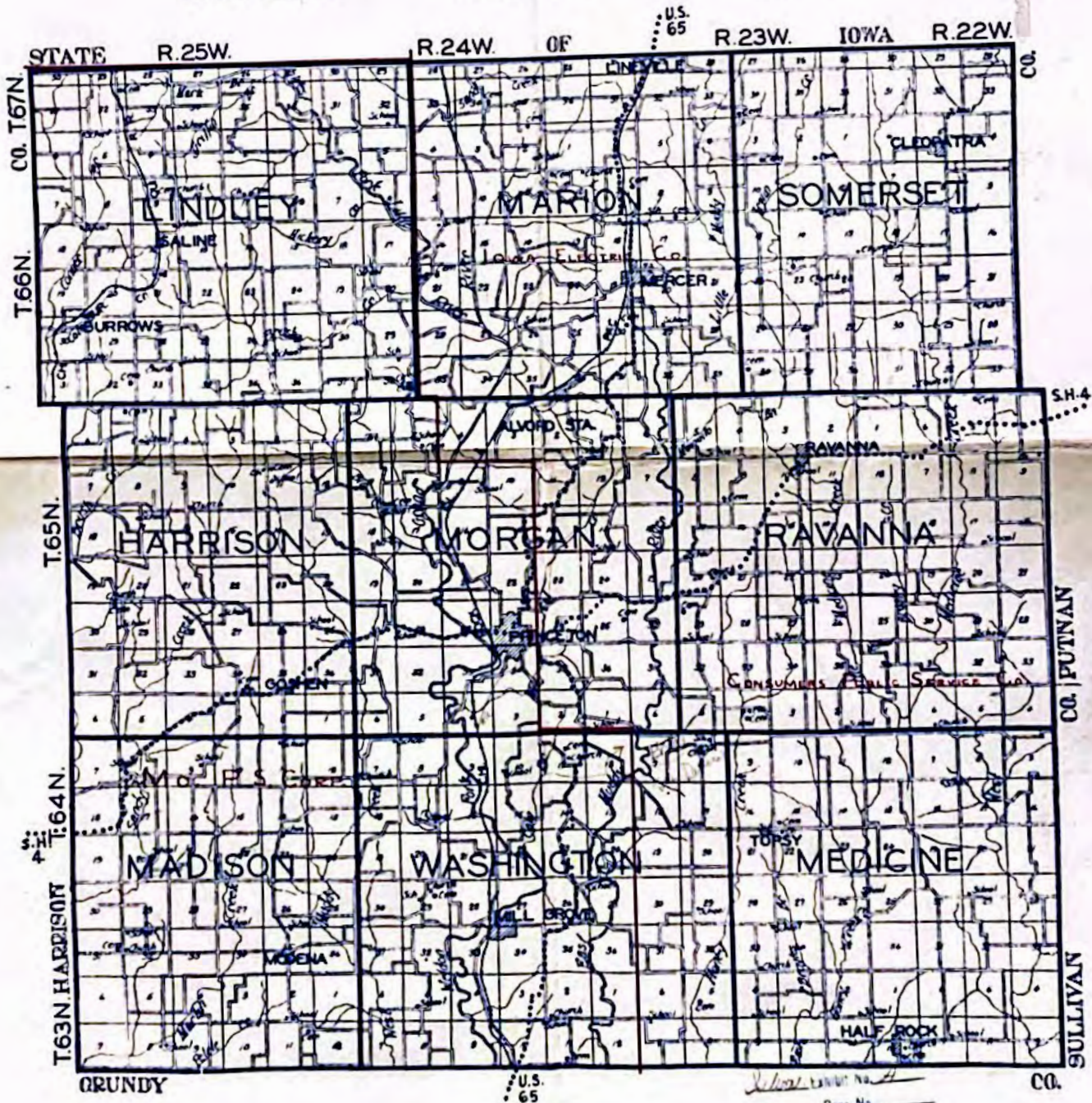
Mercer County  
(Continued)

Sections 29 and 30 in above said Township and Range and continuing West through the center of Section 25, Township 67 North, Range 25 West and continuing West through the centers of Sections 26, 27, 28, 29, and 30 in above said Township and Range and along a line more generally described as the Missouri-Iowa State line.

Exhibit 2-66

— PROPOSED TERRITORIAL BOUNDARY LINE

# MERCER COUNTY MISSOURI



\_\_\_\_\_  
 Case No. \_\_\_\_\_  
 \_\_\_\_\_

DESCRIPTION OF BOUNDARY LINE  
Grundy County

9470  
Exhibit A-17

The territory of the Missouri Public Service Corporation shall include all of that territory laying generally West of a line beginning at the Southwest corner of Section 31, Township 60 North, Range 22 West; thence East to the Southeast corner of said Section 31; thence North along the East side of said Section 31 and continuing North along the East boundary lines of Sections 30, 19, 8, and 7 and ending at the Northwest corner of Section 7 in above said Township and Range; thence East along the South boundary line of Section 32, Township 61 North, Range 22 West to the Southeast corner of said Section 32; thence North along the East boundary lines of Sections 32, 29, 20, 17, 8, and 5, all contained within Township 61 North, Range 22 West and continuing North along the East boundary line of Section 32, Township 62 North, Range 22 West, and continuing North along the East boundary line of Section 29 in above said Township and Range to the Northeast corner of said Section 29; thence West along the North boundary line of said Section 29, and continuing West along the North boundary line of Section 30, all contained within Township 62 North, Range 22 West and, continuing West along the North boundary line of Section 25, Township 62 North, Range 23 West, and continuing West along the North boundary lines of Sections 26 and 27 in above said Township and Range to the Northwest corner of said Section 27; thence North along the East boundary lines of Sections 21, 16, 9, and 4, all contained within Township 62 North, Range 23 West, and continuing North along the East boundary line of Section 33, Township 63 North, Range 23 West, and continuing North along the East boundary lines of Sections 28, 21, and 16 in above said Township and Range to the Northeast corner of said Section 16; thence West along the North boundary line of Sections 16, 17, and 18 and ending at the Northwest corner of said Section 18, all contained within Township 63 North, Range 23 West, as shown on the attached map.

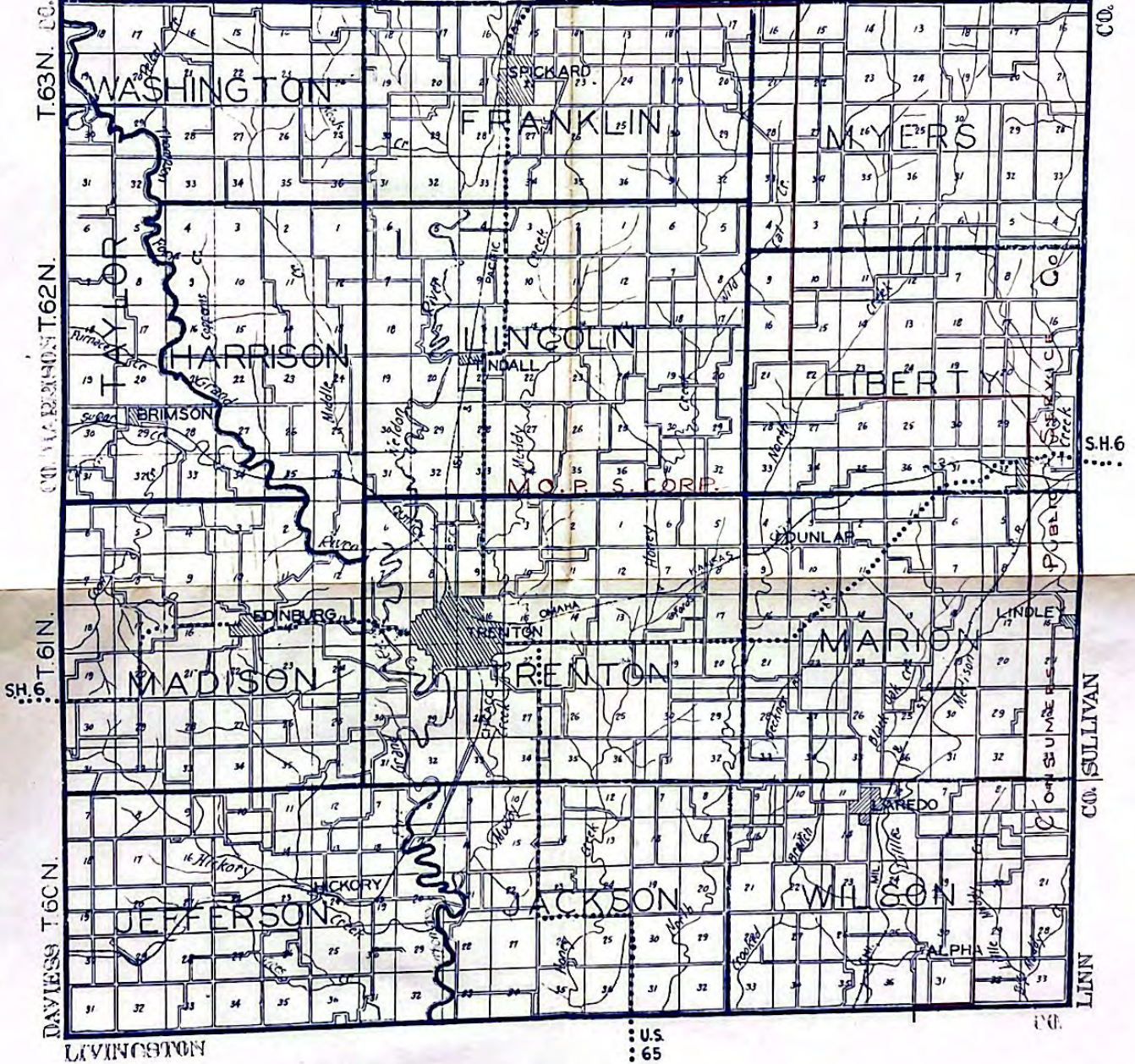
In the event the attached map is in error, the boundary line is to follow the same general route after such revisions as may be necessary in revising the description are made or may be made.

Exhibit A-17

# GRUNDY COUNTY MISSOURI

U.S. 65

MERCER R. 25W. R. 24W. R. 23W. R. 22W. CO.



9470

DESCRIPTION OF BOUNDARY LINE

Exhibit A-18

Daviess County

All of that territory laying North and East of a line described as follows:

Beginning at the Southeast corner of Section 24, Township 58 North, Range 26 West; thence West along the South boundary lines of Sections 24, 23, 22, 21, 20, and 19 in above said Township and Range and continuing West along the South boundary lines of Sections 24, 23, 22, 21, 20, and 19 in Township 58 North, Range 27 West, and continuing West along the South boundary lines of Sections 24 and 23, Township 58 North, Range 28 West to the Southwest corner of said Section 23; thence North along the West boundary lines of Sections 23, 14, 11, and 2 in above said Township and Range, and continuing North along the West boundary lines of Sections 35, 26, 23, 14, 11, and 2, Township 59 North, Range 28 West to the Northwest corner of said Section 2; thence East along the North boundary line of said Section 2 and Section 1 in above said Township and Range, and continuing East along the North boundary line of Section 6, Township 59 North, Range 27 West to the Northeast corner of said Section 6; thence in a Northeasterly direction through Sections 32, 29, 28, 21, 22, 15, 14, 11, and 12, Township 60 North, Range 27 West to the Southwest corner of Section 31, Township 61 North, Range 26 West; thence North along the West boundary lines of Sections 31, 30, 19, 18, 7, and 6, Township 61 North, Range 26 West, and continuing North along the West boundary line of Section 31, Township 62 North, Range 25 West to the Northwest corner of said Section 31; thence West along the North boundary lines of Sections 36, 35, 34, 33, 32, and 31, Township 62 North, Range 27 West, and continuing West along the North boundary lines of Sections 36, 35, 34, 23, 32, and 31, Township 62 North, Range 28 West, and continuing West along the North boundary lines of Sections 36, 35, 34, 33, 32, and 31, Township 62 North, Range 29 West to the Northwest corner of said Section 31, in above said Township and Range.



## DESCRIPTION OF BOUNDARY LINE

Livingston County

9470

Exhibit A-19

All of that territory in Livingston County laying generally North and West of a line described as beginning at the Southwest corner of Section 19, Township 58 North, Range 25 West; thence East along the South boundary lines of Sections 19, 20, 21, 22, 23, and 24, all contained within the above said Township and Range, and continuing East along the South boundary line of Section 19, Township 58 North, Range 24 West, and continuing East along the South boundary lines of Sections 20 and 21, in above said Township and Range to the Southeast corner of said Section 21; thence South along the West boundary line of Sections 27 and 34 in above said Township and Range, and continuing South along the West boundary line of Section 3, Township 57 North, Range 24 West, and continuing South along the West boundary line of Section 10 in above said Township and Range to the Southwest corner of said Section 10; thence East along the South boundary lines of Sections 10, 11, and 12 in above said Township and Range to the Southeast corner of said Section 12; thence South along the West boundary line of Section 18, Township 57 North, Range 23 West and along the West boundary line of Section 19 in above said Township and Range to a point located one-quarter ( $1/4$ ) mile, more or less, South of the Northwest corner of said Section 19; thence East through said Section 19 to a point located on the East boundary line of said Section 19, which point is one-quarter ( $1/4$ ) mile, more or less, South of the Northeast corner of said Section 19; thence North along the East boundary line of said Section 19, and continuing North along the East boundary lines of Sections 18, 7, and 6 in above said Township and Range, and continuing North along the East boundary line of Section 31, Township 58 North, Range 23 West to a point located on the East boundary line, which point is one-quarter ( $1/4$ ) mile, more or less, North of the Southeast corner of said Section 31; thence West through said Section 31 to a point located approximately three-quarters ( $3/4$ ) of a mile West of the above described point and more generally described as the East corporate limits of the City of Chillicothe; thence due North for a distance of approximately one-half ( $1/2$ ) mile and along a line more generally described as the East corporate limits of the City of Chillicothe; thence East through Section 31 to a point on the East boundary line of said Section 31, which point is located one-quarter ( $1/4$ ) mile, more or less, South of

DESCRIPTION OF BOUNDARY LINE

Livingston County  
(Continued)

the Northeast corner of said Section 31; thence North along the East boundary line of said Section 31 to the Northeast corner of said Section 31; thence East along the South boundary lines of Sections 29 and 28 and to a point located on the South boundary line of Section 27, which point is one-half ( $1/2$ ) mile, more or less, East of the Southwest corner of said Section 27; thence North through the centers of Sections 27, 22, 15, 10, and 3 to a point on the North boundary line of said Section 3, which point is located one-half ( $1/2$ ) mile, more or less, East of the Northeast corner of said Section 3, all contained within Township 58 North, Range 23 West; thence East along the South boundary line of Section 34, Township 59 North, Range 23 West, and continuing East along the South boundary lines of Sections 35 and 36 in above said Township and Range to the Southeast corner of said Section 36; thence North along the East boundary lines of Sections 36, 25, 24, 13, 12 and 1, and ending at the Northeast corner of Section 1 in above said Township and Range.



GRUNDY COUNTY

COUNTY

# LIVINGSTON COUNTY MISSOURI

PROPOSED TERRITORIAL BOUNDARY LINE.

Exhibit 2-19

COUNTY T-59-N

DAVIESS COUNTY T-58-N

COUNTY T-57-N

CALDWELL COUNTY T-56-N

COUNTY

LINN COUNTY

COUNTY

HARITON COUNTY

R-25-W R-24-W R-23-W R-22-W

R-25-W R-24-W R-23-W R-22-W

CARROLL COUNTY

COUNTY

Exhibit 2

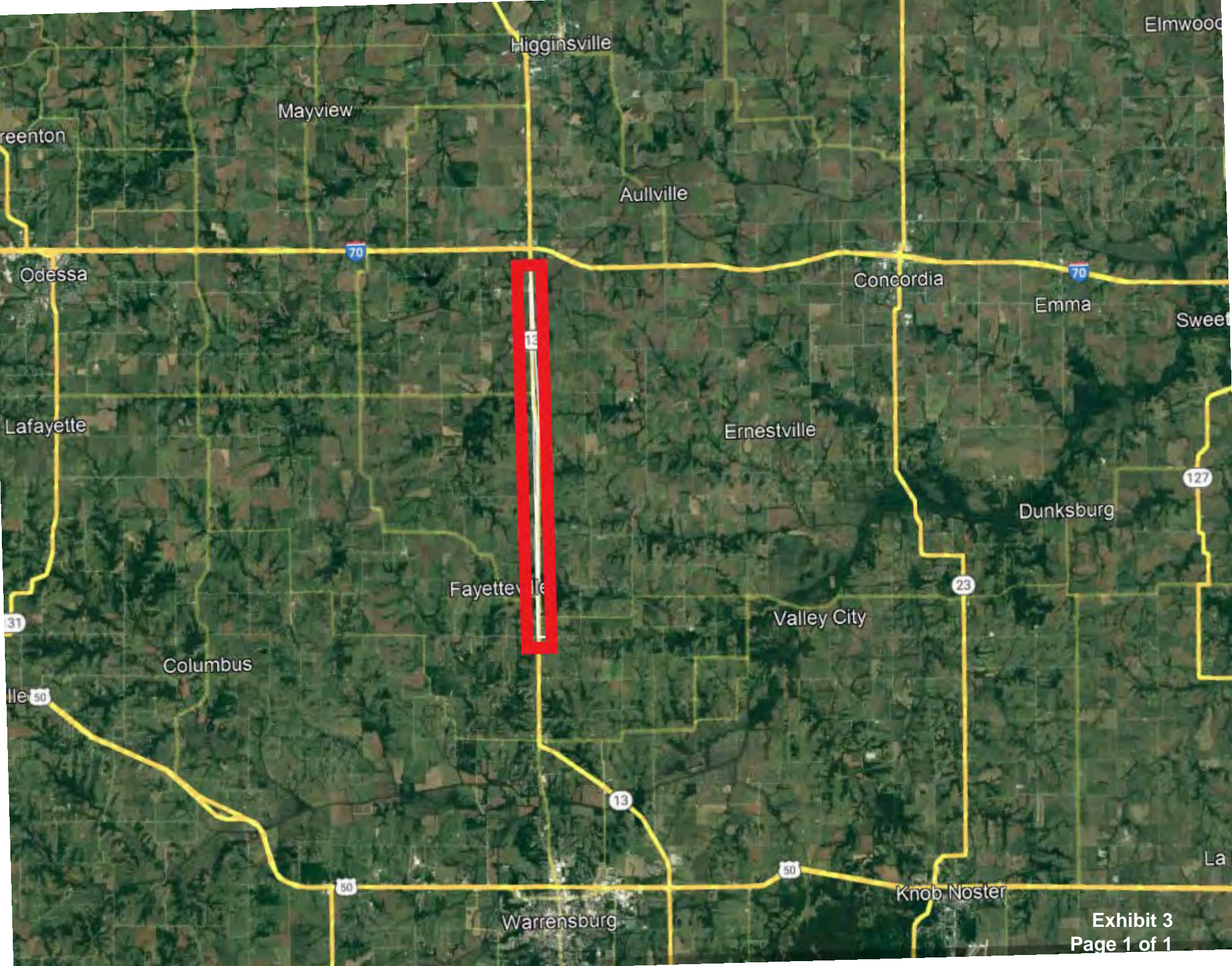
Page 40 of 40

Geologic Inc., Kansas City, Mo.

**LEGEND**

	U. S. HIGHWAYS		RAILROADS
	STATE HIGHWAYS		STREAMS
	SUPPLEMENTARY		DRAINAGE DITCHES
	PAVED ROADS		POLITICAL TOWNSHIP
	GRAVELLED ROADS		SCHOOLS
	GRADED ROADS		CHURCHES
	EARTH ROADS		CEMETERIES





Higginsville

Mayview

Aullville

reenton

Odessa

Concordia

Emma

Sweet

Lafayette

Ernestville

Dunksburg

Fayetteville

Valley City

Columbus

lle 50

Warrensburg

Knob Noster

La

**KCP&L GREATER MISSOURI OPERATIONS COMPANY**

P.S.C. MO. No. 1 1<sup>st</sup> Revised Sheet No. 13  
 Canceling P.S.C. MO. No. 1  Original Sheet No. 13

For Missouri Retail Service Area

DESCRIPTION OF SERVICE TERRITORY (Continued)  
 ELECTRIC

**JACKSON COUNTY**

<u>TOWNSHIP</u>	<u>RANGE</u>	<u>SECTIONS</u>
47 North	29 West	4 - 9, 16 - 21, 28 - 33
47 North	30 West	1 - 36
47 North	31 West	1 - 36
47 North	32 West	1 - 5, 8 - 36
47 North	33 West	9 - 16, 20 - 29, 32 - 36
48 North	29 West	4 - 9, 16 - 21, 28 - 33
48 North	30 West	1 - 36
48 North	31 West	1 - 36
48 North	32 West	1 - 5, 8 - 17, 20 - 36
49 North	29 West	4 - 9, 16 - 21, 28 - 33
49 North	30 West	1 - 3, 10 - 15, 19 - 36
49 North	31 West	19 - 36
49 North	32 West	21 - 29, 32 - 36
50 North	29 West	5 - 9, 16 - 21, 28 - 33
50 North	30 West	1 - 3, 10 - 15, 22 - 27, 34 - 36
51 North	29 West	23, 26, 27, 34, 35

**JOHNSON COUNTY**

All of Johnson County except for the following areas:

<u>TOWNSHIP</u>	<u>RANGE</u>	<u>SECTIONS</u>
48 North	24 West	25
47 North	24 West	12, 13, 24 and 25

Orders granting the service territory take precedence in any discrepancies between them and the information listed above. More detail is available in the orders, and the above should not be relied upon for detailed territory boundaries.

FILED  
 January 10, 2018  
 Missouri Public  
 Service Commission  
 EA-2018-0021; YE-2018-0076

Issued: December 11, 2017  
 Issued by: Darrin R. Ives, Vice President

Effective: January 10, 2018  
 1200 Main, Kansas City, MO 64105

**DESCRIPTION OF SERVICE TERRITORY ELECTRIC (Continued)**

**LAFAYETTE COUNTY**

<u>TOWNSHIP</u>	<u>RANGE</u>	<u>SECTIONS</u>
48 North	24 West	2 - 11, 14 - 23
48 North	25 West	1 - 24
48 North	26 West	1 - 24
48 North	27 West	1 - 36
48 North	28 West	1 - 36
48 North	29 West	1 - 3, 10 - 15, 22 - 27, 34 - 36
49 North	24 West	31 - 35
49 North	25 West	31 - 36
49 North*	26 West*	25 - 36
49 North	27 West	4 - 9, 16 - 21, 25 - 36
49 North	28 West	1 - 36
49 North	29 West	1 - 3, 10 - 15, 22 - 27, 34 - 36
50 North	25 West	1 - 8
50 North	26 West	1 - 12, 17, 18
50 North	27 West	1 - 21, 28 - 33
50 North	28 West	1 - 36
50 North	29 West	13, 15, 22 - 27, 34 - 36
51 North	25 West	1 - 36
51 North	26 West	19 - 36
51 North	27 West	22 - 27, 33 - 36
51 North	28 West	22, 26 - 29, 31 - 36

**LIVINGSTON COUNTY**

<u>TOWNSHIP</u>	<u>RANGE</u>	<u>SECTIONS</u>
57 North	23 West	6, 7, 18
57 North	24 West	1 - 3, 10 - 13
58 North	23 West	1 - 12, 15 - 22, 27 - 31
58 North	24 West	1 - 27, 34 - 36
58 North	25 West	1 - 24
59 North	23 West	1 - 36
59 North	24 West	1 - 36
59 North	25 West	1 - 36

Orders granting the service territory take precedence in any discrepancies between them and the information listed above. More detail is available in the orders, and the above should not be relied upon for detailed territory boundaries.

\*See Sheet 17.4 City of Higginsville. Township 49 North, Range 26 West

Issued: August 23, 2021  
 Issued by: Darrin R. Ives, Vice President

Effective: September 22, 2021  
 1200 Main, Kansas City, MO 64105

FILED  
 Missouri Public  
 Service Commission  
 EO-2021-0388: YE-2022-0039

Public