

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

In the Matter of the Application)	
Of Heidi Orton for Change of)	
Electric Supplier to Platte-Clay)	
Electric Cooperative from)	File No. EO-2024-0142
Evergy Missouri West, Inc.)	
d/b/a Evergy Missouri West)	

RESPONSE OF PLATTE-CLAY ELECTRIC COOPERATIVE, INC.
TO APPLICATION OF HEIDI ORTON
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 Heidi Orton (“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 October 27, 2023 and, in support thereof, states as follows:

1. On October 26, 2023, Heidi Orton (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 a structure located at 1000 NE 145th Terrace, Smithville, Missouri 64089 (the “Property”).
2. Platte-Clay admits it serves Applicant’s barn at the Property, but no other structures.
3. Platte-Clay is without knowledge to confirm or deny the remaining allegations of the Application.
4. If Ordered to serve this location by the Commission, Platte-Clay is ready, willing and able to so serve.

5. Platte-Clay supports the Application for the following reasons:
 - a. Applicant has alleged sufficient cause under Missouri statutes to support a finding that a change of supplier is in the public interest.
 - i. Applicant has alleged deficiency in the electric service provided by Evergy as an energy provider. Platte-Clay offers that the situation is not ideal for Evergy, Platte-Clay nor Applicant and Evergy is not necessarily to blame for these issues.
 - ii. In the past, there were rare situations in which “border customers” were located in the city limits of Kansas City or Smithville but Evergy’s predecessor did not have any facilities close to the customer, so Evergy’s predecessor would connect to Platte-Clay’s facilities with transformers, primary lines, secondary lines, etc. to run service to the customer. Platte-Clay would then supply wholesale power to Evergy for that service location and the customer would be an Evergy customer. Ms. Orton is one such customer. When outages occur, the problem can be on either Platte-Clay or Evergy and it is often confusing and a difficult situation for both electric suppliers and the customer to deal with. For this reason, Platte-Clay believes that it is in the public interest to allow Applicant to be solely served by Platte-Clay.
 - b. The facts of this case are identical to the case File No. EO-2022-0320 and Platte-Clay supports the same remedy for the instant case.

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

Respectfully submitted,

FRIEL, McCORD & SMILEY, LLC

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**ATTORNEYS FOR PLATTE-CLAY
ELECTRIC COOPERATIVE**

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed on EFIS on this 14th day of November, 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