

**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)
Every Missouri West, Inc. d/b/a Every)
Missouri West)
File No. EO-2024-0035

**STAFF’S PROPOSED JOINT STIPULATION
OF UNDISPUTED FACTS**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and hereby submits its Proposed Joint Stipulation of Undisputed Facts.

1. Judith Turner-Davis (“Applicant”) property in question is located at ** [REDACTED] **. ^{**1} Electric service is provided at that address by Every Missouri West, Inc., doing business as Every Missouri West.²

2. Every Missouri West, Inc. (“Every West”), is a corporation that provides electric service at retail to the public for light, heat, and power, via electrical plant that it owns, manages or controls. Every West is a wholly-owned subsidiary of Every, Inc., a publicly-traded public utility holding company.

3. On August 7, 2023, Applicant filed an application with the Missouri Public Service Commission requesting that her electric service supplier be changed from Every West to Platte-Clay Electric Cooperative, Inc.³

4. Platte-Clay Electric Cooperative, Inc. (“Platte-Clay”), is a rural electric cooperative organized under Chapter 394, RSMo. (2021), to provide electric service to

¹ *Application*, ¶ 1; *Every West’s Response*, ¶ 1; *Platte-Clay’s Response*, ¶ 1
² *Application*, ¶ 2.
³ *Application*, ¶4; *Every West’s Response*, ¶ 1; *Platte-Clay’s Response*, ¶ 1.

its members located in all or parts of seven Missouri counties, including Platte County, in which lies the property identified in the *Application*.

5. Applicant stated that her reason for requesting the change of supplier is “Location”. The property in question is completely surrounded by Platte-Clay Electric Cooperative. The main house is serviced by Evergy and the rental house ½ mile to the south is serviced by Platte-Clay. The two houses are on the 80-acre farm which is a Missouri Century farm that has been in the family since 1906.”⁴

6. Staff’s investigation revealed the following:⁵

- a. The Applicant owns a property with two premises located approximately a half-mile apart, one being the main house serviced by Evergy West and the rental house serviced by Platte-Clay.
- b. When the rental house is unoccupied, the Applicant pays the electrical bill.

7. Platte-Clay takes no position on the sufficiency of the Application, Evergy West believes the Application fails to meet the burden of proof for a change of supplier, and Staff recommends that the Commission deny the Application.⁶

WHEREFORE, Staff respectfully requests that the Commission accept this *Joint Stipulation of Undisputed Facts*.

⁴ *Application*, ¶ 5.

⁵ *Staff Recommendation*, Appendix A, p. 3.

⁶ *Platte-Clay’s Response*, ¶ 3; *Evergy West’s Response*, ¶ 3; *Staff Recommendation*, Appendix A, p. 1.

Respectfully submitted,

/s/ Ron Irving

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 1st day of December 2023.

/s/ Ron Irving