

**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)

STAFF’S STATEMENT OF POSITION

COMES NOW Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and hereby files its *Staff’s Statement of Position*. On November 22, 2023, the Commission issued its *Order Setting Procedural Schedule* which ordered the parties to file Statements of Position by December 22, 2023.

1. Is moving a customer from one utility to another utility for the sake of that customer’s billing convenience in the public interest?

Staff’s Position: No. The Commission has identified ten factors when considering the meaning of ‘public interest’ for a change of supplier request. In Ms. Turner-Davis’ application, the Applicant indicated that the property is located in an area serviced by Platte-Clay. The main house located on the property is serviced by Evergy Missouri and a rental house also located on the property approximately a half-mile south of the main house, is serviced by Platte-Clay.¹ When the rental house is vacant, the Applicant pays the electric bill.²

The Applicant has not witnessed any notable differences in power quality or service, and has not informed Staff of any health or safety issues.³ Platte-Clay would be

¹ *Judith Turner-Davis Application*, ¶ 5 (August 7, 2023); *Staff Recommendation*, Appendix A, P. 3 (September 27, 2023).

² *Staff Recommendation*, Appendix A, P. 3.

³ *Id.* P 7.

able to provide electric service to the main house but would have to build one-quarter to half-mile of line and the Applicant will be required to pay some of the cost of construction.⁴

The inconvenience of paying multiple electric suppliers for two premises located on the same property does not outweigh the burden on others related to the duplication of services and cost related to extending Platte-Clay's line to service the customer.⁵

Granting the change of electric service provider application is not in the public interest for reasons other than a rate differential as required under §§393.106.2 and 394.315.2, RSMo (2021) and 20 CSR 4240-3.140.⁶

WHEREFORE, Staff respectfully submits this *Statement of Position* and continues its recommendation that the Commission deny Ms. Turner-Davis' *Application*.

Respectfully submitted,

/s/ Ron Irving
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⁴ *Response of Platte-Clay Electric Cooperative, Inc. to Application of Judith Turner-Davis for a Change of Electric Supplier*, P. 2, ¶ 4.

⁵ *Staff Recommendation*, Appendix A, P. 3-7.

⁶ *Id.*

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 21st day of December 2023.

/s/ Ron Irving