

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

In the Matter of the Joint Application of)
Union Electric Company, d/b/a Ameren)
Missouri and Tri-County Electric Cooperative)
for an Order Approving a Territorial)
Agreement Regarding Service to)
Customers in Adair County, Missouri)

File No. EO-2024-0208

**STAFF’S STATUS REPORT AND
REQUEST FOR EXTENSION**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), through counsel, and provides the Commission with a status report on the application described in the case caption, and asks the Commission to grant an extension within which to resolve deficiencies in the application and file a recommendation. Staff and counsel have been in contact with the Joint Applicants, and are under the impression more time is needed to allow the application filed to be properly processed.

On January 3, 2024, Ameren Missouri and Tri-County (Joint Applicants) filed with the Commission seeking approval of their Territorial Agreement (TA). The Joint Applicants also requested a variance per 20 CSR 4240-4.017(1)(D) and expedited treatment per 20 CSR 4240-2.080(14). The Joint Applicants subsequently filed a Joint Motion to Amend Exhibits to Application on January 29, 2024.

Staff identified two concerns arising out of the original application and not remedied by the Motion to Amend Exhibits. First, despite the Joint Applicants requesting expedited treatment regarding gaining Commission approval of their proposed TA, the Joint Applicants have not yet provided the required filing fee of \$500.00 as required by

20 CSR 4240-3.120¹, in spite of attesting to providing said fee in Paragraph 12 of the Joint Application. This fee must be received prior to processing their proposed TA. Secondly, this TA currently contains an error, as acknowledged by the Joint Applicants, regarding the labeling of service areas.² Staff is anticipating an amended Application filing that will address this discrepancy. Staff cannot file their recommendation until the fee has been satisfied and the discrepancy rectified. Staff asks the Commission to set a deadline for the recommendation once the appropriate fee and filings have been received.

WHEREFORE, Staff asks the Commission to accept this status report, to order the joint applicants to pay the required fee and file amended documents as necessary, and to order Staff to file its recommendation thereafter.

Respectfully Submitted,

/s/ Tracy D. Johnson

Tracy D. Johnson #65991

Senior Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, Mo 65102-0360

(573) 526-5343

tracy.johnson@psc.mo.gov

Attorney for the Staff of the

Missouri Public Service Commission

¹ Per 20 CSR 4240-3.130.5 - The application shall be accompanied by an initial filing fee in the amount of five hundred dollars (\$500).

² The current TA, on page 2 section 1.B, defines certain areas in Adair County, within and around the City of Kirksville, Missouri, as Tracts One, Two, and Three as exclusive service territories to Ameren Missouri and Tri-County respectively, but the exhibits identify only two service areas and are not labeled as specific "tracts".

CERTIFICATE OF SERVICE

The undersigned by his signature below certifies that the foregoing pleading was served upon all counsel of record on this February 2nd, 2024, by electronic filing in EFIS, electronic mail, hand-delivery, or U.S. postage prepaid.

/s/ Tracy D. Johnson