

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

In the Matter of the Application of Garrett)
Stancer and Southway Storage for Change)
of Electric Supplier from The Empire District) **File No. EO-2024-0194**
Electric Company d/b/a Liberty to White River)
Valley Electric Cooperative, Inc.)

**WHITE RIVER VALLEY ELECTRIC COOPERATIVE'S RESPONSE
TO STAFF'S RECOMMENDATION**

COMES NOW White River Valley Electric Cooperative, Inc. ("White River"), by and through its attorney's undersigned and of record, and for its timely Response to Staff's Recommendation pursuant to Commission Order entered March 13, 2024, hereby states to the Commission as follows:

1. On December 12, 2023, Southway Storage filed its Application for Change of Supplier with the Commission requesting a change of electric supplier from The Empire District Electric Company d/b/a Liberty ("Liberty") to White River.

2. Liberty and White River filed their response to the Application on January 12, 2024, and Staff recently filed its Recommendation in this cause on March 12, 2024.

3. White River has now had the opportunity to review Staff's Recommendation and the well-reasoned conclusions reached therein.

4. Based on the undisputed material facts made part of the record in this case including those submitted by each party to each Data Request, and the governing law on the issues at hand, White River hereby subscribes to Staff's Recommendation and is in full support of it.

5. Should further proceedings be directed or required by the Commission,

White River is willing to present further evidence and legal briefing on the matter, but in White River's view, PSC Staff, and now the Commission, has, as part of this record, what is necessary for a Final Commission Order in this case.

WHEREFORE, above considered, White River Valley Electric Cooperative respectfully requests that the Commission issue its Order granting the relief set forth in the Application filed in this cause pursuant to Staff's Recommendation, thereby allowing White River to serve the Property on behalf of its Owner and all permanent structures to be located thereon, and for such other and further relief the Commission deems just and proper.

Respectfully submitted,

CARNAHAN EVANS PC

/s/ Christiaan D. Horton

By _____

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CERTIFICATE OF SERVICE

The hereby certify that the above document was filed in EFIS on this 22nd day of March 2024 with notice of the same sent to all counsel of record. A copy was also provided by U.S. mail, postage prepaid to the pro se Applicant and by electronic transmission to counsel for Staff, OPC and The Empire District Electric Company.

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