

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

In the Matter of the Application of Union Electric       )  
Company d/b/a Ameren Missouri and Three Rivers       )  
Electric Cooperative for Authority for Ameren       )  
Missouri to Sell or Transfer a Portion of Its Franchise,       )  
Works, or System to Three Rivers, and to Approve       )  
the Transfer of Customers between Electric Suppliers       )  
the change in electric supplier for certain customers       )  
for reasons in the public interest.       )

**File No. EO-2015-0328**

**STAFF RESPONSE TO ORDER DIRECTING FILING**

**COMES NOW**, Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its response to the Commission's August 26, 2015, *Order Directing Filing*, respectfully states:

1. On August 25, 2015, Union Electric Company d/b/a Ameren Missouri and Three Rivers Electric Cooperative jointly filed an *Application for Authority to Sell or Transfer Assets and to Transfer Customers Between Electric Suppliers* with the Commission requesting Commission authorization for Ameren Missouri to transfer certain of its distribution facilities to Three Rivers (§ 393.190, RSMo.), to change the electric supplier from Ameren Missouri to Three Rivers for eighteen (18) structures currently being served by Ameren Missouri (§ 393.106, RSMo.), and to change the electric supplier from Three Rivers to Ameren Missouri for thirty-nine (39) structures currently being served by Three Rivers (§ 394.312, RSMo.), so they may effectuate their agreement to swap facilities, and customers and members being served by those facilities to avoid future duplication of facilities, and to enhance safety and reliability.

2. On August 26, 2015, the Commission issued its *Order Directing Filing* by which it directed Staff to file a response by September 9, 2015, informing the

Commission of “the date by which [Staff] reasonably can file a recommendation on the application.”

3. Staff recommends that the Commission issue notice to the affected customers, members, and owners of record of the structures, to include, in part, that Ameren Missouri and Three Rivers seek Commission approval to change the electric service to the structures on the parcels from Ameren Missouri to Three Rivers and from Three Rivers to Ameren Missouri in Case No. EO-2015-0328. Additionally, Staff recommends that the notice include the manner and method by which they may intervene in the case to participate and be heard, and estimates on billing or service charge differences, if any, affected customers should expect if the transaction is approved by the Commission.

4. In terms of the method of delivery, Staff believes that the best manner to provide notice to those affected is by mail.

5. Exhibits A and B of the application include the identifying information of the members and customer account holders affected by the proposed transfers of suppliers; however, some of the information provided is insufficient for the purpose of providing notice of the application. In addition, it is possible that those identified in the exhibits under “consumer names” do not own a structure, e.g., lessees. Staff recommends that the Commission direct Ameren Missouri and Three Rivers to provide it with a listing of customers, members, and owners of record of the structures that they propose to be exchanged between them, with a current mailing address for each so that the Commission may mail a notice of the *Application* to each and advise them of the intervention date of thirty (30) days from the Commission’s issuance of notice.

6. Staff is in the process of sending data requests to Ameren Missouri and Three Rivers. Staff reasonably needs until December 18, 2015, to conduct discovery and thoroughly investigate the matters raised by the application.

**WHEREFORE**, Staff files this *Staff Response to Order Directing Filing* by which its advises the Commission it requires until December 18, 2015, to file its recommendation, and makes recommendations to the Commission regarding notice to those whose service will be affected if the Commission grants the authorizations requested in this application.

Respectfully submitted,

**/s/ William Hampton Williams II**

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#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, electronically mailed, sent by facsimile or hand-delivered to all counsel of record this 4<sup>th</sup> day of September 2015.

**/s/ William Hampton Williams II**