

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

In the Matter of the Application of Richard)
and Felicia Murphy for change of electric)
supplier from Co-Mo Electric Cooperative) File No. EO-2024-0331
to Union Electric Company d/b/a Ameren)
Missouri)

**AMEREN MISSOURI’S RESPONSE TO APPLICATION
FOR CHANGE OF ELECTRIC SUPPLIER**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), and for its response to the Application of Richard and Felicia Murphy (the "Applicants") for Change of Electric Supplier, Ameren Missouri respectfully states as follows to the Missouri Public Service Commission (the "Commission"):

1. On May 3, 2024, an application was filed herein, requesting that the electric supplier for the property located at 1915 Tisdale Drive, Boonville, Missouri 65233, be changed from Co-Mo Electric Cooperative ("Co-Mo") to Ameren Missouri.
2. On May 6, 2024, an Order was entered directing Co-Mo and Ameren Missouri to submit responses to this application by June 6, 2024.
3. Regarding paragraph one of the application, Ameren Missouri admits that Applicants' property is located at or about 1915 Tisdale Drive, Boonville, Missouri 65233.
4. Regarding paragraph two of the application, Ameren Missouri admits that Co-Mo is currently providing electric service to Applicants' property.
5. Regarding paragraphs 3 through 5 of the application, Ameren Missouri acknowledges that Applicant is requesting that the Commission order a change of electric supplier for the 1915 Tisdale Drive property from Co-Mo to Ameren Missouri. Ameren Missouri admits that its service territory surrounds two sides of the 1915 Tisdale Drive property and that Ameren

Missouri has electric facilities within 100 feet of the 1915 Tisdale Drive property. Ameren Missouri further states that it is capable of extending service to the 1915 Tisdale Drive property in an expeditious manner and with minimal investment. Ameren Missouri further admits that, pursuant to a territory agreement between Co-Mo and Ameren, dated May 2022, Co-Mo has the first right to serve the 1915 Tisdale Drive property. Ameren Missouri is without sufficient knowledge or information to admit or deny the remaining allegations contained in paragraphs 3 through 5.

6. Regarding paragraph 6 of the Application, Ameren Missouri is without sufficient knowledge or information to admit or deny the allegations contained in paragraph 6.

7. Ameren Missouri is a "public utility" and an "electric corporation" pursuant to RSMo. § 386.020, with its Missouri operations subject to the jurisdiction of the Commission as provided by law.

8. As stated above, Ameren Missouri recognizes Co-Mo's first right to serve the 1915 Tisdale Drive property as established by a territory agreement between Co-Mo and Ameren. Nonetheless, Ameren Missouri is willing to extend service to the 1915 Tisdale Drive property if the Commission so orders or if Co-Mo does not wish to exercise its right to serve.

WHEREFORE, for the reasons stated above, Ameren Missouri prays that this Commission issue an Order either approving or denying Richard and Felicia Murphy's application. Ameren Missouri seeks such additional relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ William D. Holthaus, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was filed in EFIS on this 5th day of June, with notification of same being sent to all counsel of record.

/s/ William D. Holthaus, Jr.
William D. Holthaus, Jr.