

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

In the Matter of the Application of Missouri	)	
Department of Transportation for change of	)	
electric supplier from Union Electric	)	File No. EO-2025-0019
Company d/b/a Ameren Missouri to Co-Mo	)	
Electric Cooperative	)	

**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 the Missouri Department of Transportation ("MoDOT") for Change of Electric Supplier, Ameren Missouri respectfully states as follows to the Missouri Public Service Commission (the "Commission"):

1. On July 10, 2024, an application was filed herein, requesting that the electric supplier for MoDOT's property located at 6533 State Highway MM, Sunrise Beach, Missouri 65079, be changed from Ameren Missouri to Co-Mo Electric Cooperative ("Co-Mo").
2. On October 1, 2024, an Order was entered directing Ameren Missouri and Co-Mo to submit responses to this application by November 1, 2024.
3. Regarding paragraph one of the application, Ameren Missouri admits that MoDOT's facility at issue is located at or about 6533 State Highway MM, Sunrise Beach, Missouri 65079 (MoDOT's "Facility at Issue").
4. Regarding paragraph two of the application, Ameren Missouri admits that Ameren Missouri is currently providing electric service to the Facility at Issue by way of delivering electricity to MoDOT's meter located on the north side of the bridge that is northeast of the Facility at Issue.

5. Regarding paragraphs 3 through 5 of the application, Ameren Missouri acknowledges that MoDOT is requesting that the Commission order a change of electric supplier for the Facility at Issue from Ameren Missouri to Co-Mo. Ameren Missouri admits it has been providing service to the bridge that crosses the Lake of the Ozarks on State Highway MM, as well as the Facility at Issue and nearby toll booths located at or about 6533 State Highway MM. Regarding territorial agreements, Ameren Missouri has now searched its records and has not uncovered any territorial agreement between Ameren Missouri and Co-Mo that reserves MoDOT's Facility at Issue for exclusive service by Co-Mo. Further, Ameren Missouri's tariff sheets provide that Ameren Missouri may serve the area in which the Facility at Issue is located. Ameren Missouri further states that, upon information and belief, MoDOT wants to switch from primary service to secondary service at the Facility at Issue. Ameren Missouri, however, has no infrastructure nearby from which to extend secondary service to the Facility at Issue. Ameren Missouri admits that extending secondary service to the Facility at Issue would require a significant investment.

6. Regarding paragraph 6 of the application, Ameren Missouri admits that MoDOT has previously spoken about this request for change of service with Ameren Missouri employee Andrew Pointer. Ameren Missouri denies that it previously agreed to cease serving the Facility at Issue and allow Co-Mo to provide service, though Ameren Missouri admits that it previously stated that it would consider this request. Ameren Missouri is without sufficient knowledge or information to admit or deny the remaining allegations contained in paragraph 6. For further answer, Ameren Missouri understands that Co-Mo may already have infrastructure near the Facility at Issue and therefore may be able to establish secondary service to the Facility at Issue more efficiently and with less investment.

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. In light of the additional investment required of Ameren Missouri to establish secondary service to the Facility at Issue, and if indeed Co-Mo can establish secondary service to the Facility at Issue with significantly less investment than is required of Ameren Missouri, then Ameren Missouri would be open to discussing a stipulation and agreement with Co-Mo such that Co-Mo could take over service to the Facility at Issue.

WHEREFORE, for the reasons stated above, Ameren Missouri prays that this Commission issue an Order either approving or denying MoDOT'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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**Attorney for Union Electric Company**  
**d/b/a Ameren Missouri**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was filed in EFIS on this 1st day of November, 2024 with notification of same being sent to all counsel of record.

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