

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

In the Matter of the Application of Missouri)	
Department of Transportation – Central)	
District for Change of Electric Supplier from)	File No. EO-2025-0019
Union Electric Company d/b/a Ameren)	
Missouri to Co-Mo Electric Cooperative, Inc.)	

**RESPONSE OF CO-MO ELECTRIC COOPERATIVE, INC.
TO APPLICATION OF MoDOT CENTRAL DISTRICT
FOR A CHANGE OF ELECTRIC SUPPLIER**

COMES NOW Co-Mo Electric Cooperative, Inc. (“Co-Mo”) by and through its undersigned counsel, and for its response to the Application of Missouri Department of Transportation – Central District (“Applicant”) for Change of Electric Supplier, and in response to the Public Service Commission’s (“Commission” or “PSC”) Order dated October 1, 2024, Co-Mo respectfully states as follows:

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.

2. Regarding paragraph 1 of the application, Co-Mo 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").

3. Regarding paragraph 2 of the application, Co-Mo is without sufficient knowledge or information to admit or deny the allegations.

4. Regarding paragraphs 3 through 5 of the application, Co-Mo 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. Regarding territorial agreements, Co-Mo knows of no territorial agreement between Ameren Missouri and Co-

Mo that reserves MoDOT's Facility at Issue for exclusive service by Co-Mo. Co-Mo is without sufficient knowledge or information to admit or deny the remaining allegations in paragraphs 3 through 5.

5. Regarding paragraph 6 of the application, Co-Mo is without sufficient knowledge or information to admit or deny the allegations.

6. If Ordered to serve this location by the Commission, Co-Mo is willing and able to do so as it has distribution facilities within approximately 500 feet of MoDOT's Facility at Issue. Pursuant to Co-Mo's policies that apply to all new services, some of the cost of construction will be required to be paid for by MoDOT.

7. Co-Mo is without knowledge to confirm or deny the remaining allegations of the Application.

WHEREFORE, for the reasons stated above, Co-Mo prays that this Commission issue an Order either approving or denying MoDOT's application.

Respectfully submitted,

FRIEL, McCORD & SMILEY, LLC

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**ATTORNEYS FOR CO-MO ELECTRIC
COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed on EFIS on this 4th day of November, 2024, with notification of the same being sent to all counsel of record. This pleading was also sent by electronic mail or U.S. Mail to all parties/counsel of record.

/s/ Megan E. McCord