

**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. )

**STAFF’S REPORT & RECOMMENDATION TO APPROVE APPLICATION**

**COMES NOW** Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and respectfully states as follows:

1. In its *Order Directing Notice and Directing Responses to Application* issued on October 1, 2024, the Commission ordered Staff to file a recommendation in this case no later than November 26, 2024.

2. On July 10, 2024, the Missouri Department of Transportation (“MoDOT” or “Applicant”) filed an application with the Commission requesting a change of electric supplier from the Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) to Co-Mo Electric Cooperative, Inc. (“Co-Mo”). MoDOT completed its application on October 1, 2024, and the Commission ordered Staff to file its recommendation regarding the application or a report no later than November 26, 2024, on the same date.

3. The Applicant filed its application after acquiring a toll building associated with a nearby bridge. MoDOT intends to sell the toll building. Therefore, requiring the building to have its own meter. The Applicant intends to change the toll building’s electric supplier to Co-Mo, as it serves nearby buildings. However, MoDOT intends to retain Ameren Missouri as the bridge’s electric supplier.

4. The Applicant who submitted the *Application* for a change of supplier bears the burden of proof. The Applicant must prove that the requested supplier change is in the best interests of the public and not solely driven by a rate differential.<sup>1</sup>

5. On November 1, 2024, Ameren Missouri filed its response to the Applicants' application. The Company stated that it is open to discussing a stipulation and agreement with Co-Mo.

6. On November 4, 2024, Co-Mo filed its response to the *Application*. Co-Mo took no position on the sufficiency of the *Application* and took no position on whether the Commission approved or denied Applicants' request.

7. Co-Mo is a rural electric cooperative organized under Chapter 394 RSMo (2020) to provide electric service to its members in all or parts of six Missouri counties, including Camden County. The Commission has limited jurisdiction over rural electric cooperatives. For the purposes of this case, Co-Mo is subject to the jurisdiction of the Commission under Section 394.315.2 RSMo (2020).

8. Ameren Missouri is an electrical corporation subject to the jurisdiction of the Commission as specified, in part, by Chapters 386 and 393, RSMo 2020. For the purposes of this case, Ameren is subject to the jurisdiction of the Commission under Section 393.106.2 RSMo (2020).

9. Attached hereto and incorporated herein by reference is *Staff's Report*, in which Staff recommends the Commission approve MoDOT's application.

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<sup>1</sup> The Applicant is required by 20 CSR 4240-3.140(1)(G) to include reasons why a change in electrical suppliers is in the public interest.

**WHEREFORE**, Staff recommends the Commission approve the application, and grant such relief as just under the circumstances.

Respectfully submitted,

**/s/ Eric Vandergriff**

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Missouri Public Service Commission

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record on this 26<sup>th</sup> day of November, 2024.

**/s/ Eric Vandergriff**