BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of White River Valley Electric Cooperative, Inc. For Approval of Designated Service Boundaries Within Portions of Christian County, Missouri.

Case No. EO-2025-0228

MOTION FOR EXPEDITED TREATMENT

COMES NOW White River Valley Electric Cooperative, Inc. ("White River") pursuant to 20 CSR 4240-2.080, and for its *Motion for Expedited Treatment* ("*Motion*"), respectfully states as follows to the Missouri Public Service Commission ("Commission"):

- 1. White River filed its Application for Approval of Designated Service Boundaries Within Portions of Christian County, Missouri on February 19, 2025 ("Application").
- 2. White River's Application was filed pursuant to RSMo 386.800.3 which "requires the Commission to rule on an application no later than 120 days from the application's filing date, unless otherwise ordered by the Commission for good cause shown [...]."
- 3. As stated in White River's Affidavit and Verification dated February 18, 2025, attached to its Motion for Waiver of 60 Day Notice, the landowner/developer have expressed that time is of the essence in obtaining an electric supplier for the subject property to allow the timely completion of the construction schedule. See *Affidavit and Verification* at ¶ 3.
- 4. White River has been notified by the landowner/developer that it expects to obtain approval to break ground soon and will need electric service by late spring. Therefore, White River requests that this Application be expedited in order to prevent harm to the landowner/developer and new members/customers of the development which would

occur should this case be extended beyond 90 days.

- 5. White River respectfully requests that the Commission rule on the Application no later than May 20, 2025, 90 days from the Application's filing date.
- 6. This Motion was filed as soon as White River became aware of the anticipated groundbreaking timeline and associated need for electric service by the landowner/developer.

WHEREFORE, White River requests an expedited Order of the Commission directing that the Commission rule on the Application no later than May 20, 2025. White River requests such other and further relief as is just and proper under the circumstances.

Respectfully submitted,

Megan E. McCord, #62037 Friel, McCord & Smiley, LLC P.O. Box 14287 Springfield, MO 65814 Telephone: 417-227-8405 Email: mmccord@reclawfirm.com

Attorney for White River Valley Electric Cooperative, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on March 11, 2025, to the following:

Office of the Public Counsel 200 Madison Street, Suite 650 P.O. Box 2230 Jefferson City, Missouri 65102 opcservice@ded.mo.gov Missouri Public Service Commission Staff Counsel Department 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, Missouri 65102 staffcounselservice@psc.mo.gov

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