

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

In the Matter of the Application of Edith)
Armstrong for Change of Electric Supplier)
from Empire District Electric Company)
to Ozark Electric Cooperative)

File No. EO-2018-0079

STAFF REQUEST FOR LEAVE TO FILE ADDITIONAL INFORMATION

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), through Staff Counsel's Office, and requests leave to file additional information regarding the matter of the change of electric supplier Application of Ms. Edith Armstrong. In support thereof, the Staff states as follows:

1. On November 30, 2017, the Staff filed its Memorandum Recommendation ("Recommendation") regarding the change of electric supplier Application of Ms. Elizabeth Armstrong. On December 1, 2017, the Commission issued an Order Setting Time For Responses setting until December 15, 2017 for replies to the November 30, 2017, Staff Recommendation, the October 12, 2017, Response of Ozark Electric Cooperative, and the October 18, 2017, The Empire District Electric Company Response To Application For Change Of Electric Service Provider. On December 13, 2017, Ozark Electric Cooperative, Inc. ("Ozark") filed its Response To Staff Recommendation.

2. Due to the difficulty that the Staff encountered in contacting Ms. Armstrong in its inquiry respecting her Application for change of electric supplier,¹ after filing its

¹ Ms. Armstrong has provided no e-mail address to the Commission, and for a period of time she was not living at the street address where she had been taking electric service, for which she has applied for a change of electric service provider; and for which electric service was cut off until recently. She was not answering the phone number provided on her Application for a change of electric supplier, and there was no electronic space available at the phone number to leave a voicemail message.

Recommendation on November 30, 2017, the Staff made an effort to contact Ms. Armstrong by phone even though a copy of the Staff's Recommendation was sent to the address for Ms. Armstrong on the Commission's Service List.

2. The Staff tried to reach Ms. Armstrong by calling an alternative number she had provided to the Staff when the Staff spoke with her when performing its review for its Recommendation. The Staff called this number every business day after the filing of the Staff's Recommendation. The Staff finally spoke with Ms. Armstrong on December 13, 2017, on her sister's cell phone.² She said she had not received as of yet the Staff's Recommendation. Since she previously had indicated that she was living with her sister, she was asked for her sister's mail address so that a copy of the Staff's Recommendation could be sent to that address. She provided her sister's name and her sister's U.S. mail address. A copy of the Staff's cover pleading and Memorandum Recommendation was mailed to that address on December 13, 2017.

3. The Staff told Ms. Armstrong that it had received information from Ozark on the line extension cost to connect her to the Ozark system if it were possible for her to switch electric suppliers. Ms. Armstrong indicated that the amount was cost prohibitive. **

** On Monday,

December 18, after having waited to see if any other filings might be made by the December 15 date set by the Commission certain responsive filings, the Staff telephoned Credit and Collections / Customer Service at The Empire District Electric

² See attached Staff Affidavit, Attachment 1.

Company and confirmed that Ms. Armstrong had **

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WHEREFORE the Staff requests leave to file the above additional information regarding the matter of the change of electric supplier Application of Ms. Edith Armstrong.

/s/ Steven Dottheim

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**Attorney for the Staff of the
Missouri Public Service Commission**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all counsel of record this 19th day of December, 2017.

/s/ Steven Dottheim

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AFFIDAVIT OF NOUMVI G. GHOMSI

[illegible]

COMES NOW Noumvi G. Ghomsi and on his oath declares that he is of sound mind and lawful age; that he is duly authorized to make this affidavit and that he has knowledge of the matters and things stated in the foregoing Staff Request For Leave To File Additional Information having spoken with Ms. Edith Armstrong on December 13, 2017, and having spoken with The Empire District Electric Company Credit and Collections / Customer Service on December 18, 2017, and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

Noumvi G. Ghoms

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 19 day of December, 2017.

DIANNA L. VAUGHT
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: June 28, 2019
Commission Number: 45297377

Dianne L. Vaughn
NOTARY PUBLIC