

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Blodgett Paint Ball & Fun)
Factory LLC for a Change of Electric) **File No. EO-2021-0163**
Supplier)

ORDER DIRECTING NOTICE, ADDING PARTIES, AND DIRECTING RESPONSES TO APPLICATION

Issue Date: December 8, 2020

Effective Date: December 8, 2020

On December 4, 2020, Blodgett Paint Ball & Fun Factory LLC filed an application with the Missouri Public Service Commission requesting a change of their electric supplier from Semo Electric Cooperative (Semo) to Union Electric Company d/b/a Ameren Missouri.

The Commission will direct its Data Center to send notice of the application to Semo and Ameren Missouri. Because they are necessary parties, Semo and Ameren Missouri will be joined as parties to this proceeding and will be directed to file responses to the application. The Commission will also direct the Staff of the Commission to file a recommendation.

THE COMMISSION ORDERS THAT:

1. The Data Center of the Missouri Public Service Commission shall send this order, with a copy of the application, to Semo and Ameren Missouri.
2. Semo and Ameren Missouri are made parties to this proceeding and shall each file a response to the application no later than January 6, 2021.
3. The Staff of the Commission shall file its recommendation regarding the application no later than January 29, 2021.

4. This order is effective when issued.



BY THE COMMISSION

A handwritten signature in dark ink that reads "Morris L. Woodruff".

Morris L. Woodruff
Secretary

John T. Clark, Senior Regulatory Law Judge,
by delegation of authority pursuant to
Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 8th day of December, 2020.

JOHNSON, SCHNEIDER & FERRELL, L.L.C.

ATTORNEYS AT LAW

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CAPE GIRARDEAU, MO 63701

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*MARK S. JOHNSON
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*Licensed in MO & IL

Bryon L. Connell, Jr.
1930-1998

FILED
December 4, 2020
Data Center
Missouri Public
Service Commission

Wesley L. Boie
1936-2009

December 4, 2020

Missouri Public Service Commission
ATTN: Data Center
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

RE: Application for a Change of Electric Service Provider for
Blodgett Paint Ball & Fun Factory, L.L.C.

To Whom It May Concern:

Please find enclosed an original and a copy of an Application for a Change of
Electric Service Provider in regard to the above referenced matter.

Please file the original and return a file-stamped copy of the Application in the
enclosed self-addressed postage prepaid envelope.

Thank you.

Sincerely,
JOHNSON, SCHNEIDER & FERRELL, L.L.C.

John R. Schneider

JRS:els
Enclosures a/s

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

IN THE MATTER OF THE APPLICATION OF:

BLODGETT PAINT BALL)
& FUN FACTORY, L.L.C.)
FOR A CHANGE OF ELECTRIC SUPPLIER)
Applicant.)

CASE NO.: _____

**APPLICATION FOR A CHANGE OF
ELECTRIC SERVICE PROVIDER**

1. Applicant's address is [REDACTED]
2. The name of Applicant's current electric service provider is Semo Electric.
3. Applicant requests the Missouri Public Service Commission to order a change of electric supplier to the address indicated above.
4. Applicant requests the Missouri Public Service Commission to order a change of electrical supplier from Semo Electric (current) to Ameren Missouri (requested).
5. Applicant requests the Missouri Public Service Commission to order a change of electric provider for the following reasons:
 - a. The Applicant's business, Blodgett Paint Ball & Fun Factory, L.L.C., is a Missouri limited liability company, which is a small business that is open approximately four days a month. This business has been open since 2008. The member of this business and her husband, David Russell, have ownership interests in other businesses that are supplied electricity by Ameren Missouri. It would be more efficient for Applicant and her and her husband's other businesses to be served by one provider;
 - b. The last few years, the monthly bills have been somewhat outrageous and, at times, over \$2,600.00 a month or more, which is different than the Ameren amounts charged to

the other businesses that are solely serviced by Ameren Missouri. This has placed an undue burden on Applicant, that is a small business operating approximately four (4) days per month;. Attached are sample billing statements from Co-op to Applicant;

c. Under the way the Co-op works, there is a multiplier applied and this business, Applicant herein, is treated like a business that is not truly comparable to Applicant's business. As a result of other users, it appears that Applicant herein pays a disproportionate amount for services provided as compared to actual usage. Applicant is billed as an Industrial customer, not a small business like it actually is;

d. Ameren Missouri will bill Applicant for actual usage of electricity like Applicant's other Ameren services are billed; and/or

e. Service from provider is severely delayed and at times the Co-op has been non-responsive. Applicant attempted to address these delays, but nothing changed by the Co-op. Applicant has ceased services due to the outrageous and disproportionate billing and delays in service work performance.

6. Applicant has taken the following steps in an attempt to work out electric service problems with the electric service provider: The Applicant called engineers to explain and request a reason for the economic crunch on their business. The engineers explained that Semo Electric was treating this business the same as an industrial facility. When there is an extra demand on current, such as when the air conditioners have to achieve a certain goal in a small timeframe to accommodate customers, where it is as slow as 15 minutes, it sets the monthly bill under the demand usage multiplier by 40. There was no other real explanation other than the electric service is within a Co-op and the rates will not change. As for slow response times, Applicant attempted to address these concerns/issues with the Co-op, but nothing changed. By Co-op, leading to

Applicant terminating its services with the Co-op.

7. Currently, Applicant, due to thee issues, has no service at all and is need of connecting to and being serviced by Ameren.

WHEREFORE, for the reasons set forth herein, Applicant requests the Missouri Public Service Commission to issue an order which changes the current electric service provider from Semo Electric to Ameren Missouri accordingly, and for such other and further relief as this commission can award.

Dated this 4th day of December, 2020.

JOHNSON, SCHNEIDER & FERRELL, L.L.C.

By: 

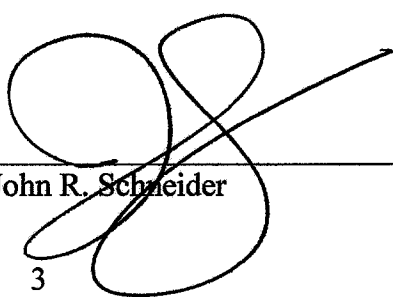
John R. Schneider No. 54194
212 North Main Street
Cape Girardeau, MO 63701
Telephone: 573-335-3300
Facsimile: 573-335-1978
Attorney for Applicant
Blodgett Paint Ball & Fun Factory, L.L.C.

CERTIFICATE OF SERVICE

The undersigned certifies that copies of the foregoing Application is filed and addressed to:

Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360
Email: pscinfo@psc.mo.gov

on this 4th day of December, 2020.


John R. Schneider

VERIFICATION BY CERTIFICATION

Margaret Russell, on oath, states that she has read the foregoing Applicant and is familiar with its contents and the matters set forth therein are true to the best of her knowledge, information and belief.

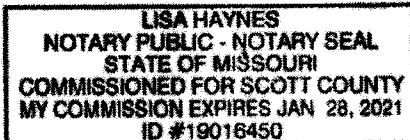
Dated this 21st day of October, 2020.

BLODGETT PAINT BALL
& FUN FACTORY, L.L.C.

By: Margaret Russell
Name: Margaret Russell
Its: Member

Subscribed and sworn to before me this 21st day of October, 2020.

Lisa Haynes
Notary Public



My Commission expires: 1-28-21

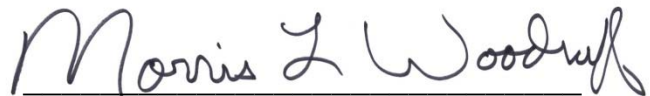
STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 8th day of December, 2020.




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

December 8, 2020

File/Case No. EO-2021-0163

**Missouri Public Service
Commission**

Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel

Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opc@opc.mo.gov

**Blodgett Paint Ball and Fun
Factory, L.L.C.**

John R Schneider
212 North Main Street
Cape Girardeau, MO 63701
john@johnsonschneider.com

SEMO Electric Cooperative

Legal Department
1505 S. Main
P.O. Box 520
Sikeston, MO 63801

Union Electric Company

Legal Department
1901 Chouteau Avenue
P.O. Box 66149, Mail Code 1310
St. Louis, MO 63166-6149
AmerenMOS@ameren.com

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.