

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

In the Matter of the Application of)
White River Valley Electric Cooperative, Inc.) Case No. EO-2025-0228
For Approval of Designated Service Boundaries)
Within Portions of Christian County, Missouri.)

**RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S OBJECTION TO THE
STIPULATION AND AGREEMENT**

COMES NOW White River Valley Electric Cooperative, Inc. (“WRVEC”) and respectfully responds to the Office of the Public Counsel’s (“OPC”) Objection to the Stipulation and Agreement, and states as follows:

1. In OPC’s Objection, it notes that WRVEC filed its Application on February 19, 2025. OPC acknowledges Liberty intervened on March 13, 2025, and was granted intervention fourteen days later. Staff filed its Recommendation on May 5, 2025, including analysis under Section 386.800.2, RSMo, and OPC supports Staff’s analysis and Recommendation.
2. OPC’s Objection argues that there is no analysis of whether granting Liberty exclusive authority over the exchanged areas would be detrimental to the public interest and that OPC is seeking to determine the number of potentially affected landowners and whether they received notice or object. The Stipulation and Agreement provides a resolution that does not transfer any existing WRVEC members/customers to Liberty, rendering OPC’s concern about current-customer transfers inapposite and eliminating the predicate for delay. *Affidavit of Rick Johnson*, January 5, 2026, ¶ 2.
3. Further, WRVEC expects the Commission to order the parties to file a subsequent Territorial Agreement Amendment case to formalize the boundary adjustments following final action in this docket as it did after a Stipulation and Agreement was reached by the parties in a previous RSMo 386.800 case, File No. EO-2022-0190. Opening such a case will, as a matter of course, provide public notice of the proposed territorial boundaries.
4. OPC acknowledges Staff’s evaluation of the statutory factors in Section 386.800.2 and agrees with Staff’s Recommendation. The Stipulation and Agreement aligns with and does not undermine those findings because it maintains the public-interest outcome

identified by Staff and supported by OPC, while resolving inter-utility boundary issues without detriment to existing WRVEC customers.

WHEREFORE, WRVEC respectfully requests that the Commission deny OPC's Objection, approve the Stipulation and Agreement, together with such further relief as is just and proper.

Respectfully submitted,

/s/ Megan E. McCord
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 January 5, 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

/s/ Megan E. McCord