BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of Ryan	)	
Edwards for Change of Electric Supplier from	)	
Liberty Utilities to Ozark Electric Cooperative, Inc.	)	Case No. EO-2026-0306

OZARK ELECTRIC COOPERATIVE'S RESPONSE TO APPLICATION

COMES NOW Ozark Electric Cooperative ("Ozark Electric") and for its response to the Application of Ryan Edwards (the "Applicant"), Ozark Electric respectfully states as follows to the Missouri Public Service Commission (the "Commission"):

1. On May 4, 2026, an application was filed herein by Ryan Edwards requesting that the electric supplier for the Applicant's property be changed from Liberty Utilities to Ozark Electric Cooperative, Inc.

2. The Commission, on May 5, 2026, issued its *Order Directing Notice, Adding Parties, and Directing Responses to Application*, directing Ozark Electric Cooperative to file its response to the application by May 26, 2026.

3. The Applicant is a current Liberty Utilities customer.

4. Ozark Electric is a rural electric cooperative organized pursuant to RSMo. §394.010, et seq.

5. RSMo. §393.106 and §394.315, commonly referred to as Missouri's anti-flip flop law, typically govern change of supplier requests. RSMo. §394.315 refers to rural electric cooperatives (like Ozark Electric) while §393.106 refers to electric corporations (like Liberty) and joint municipal utility commissions. The purpose of the statute is to "prevent customers from switching back and forth between two available electric suppliers to take advantage of rate differences" – a strong public policy of our state. *Empire Dist. Elec. Co. v. Southwest Elec. Coop.*, 863 S.W.2d 892, 896 (Mo. App. S.D. 1993).

6. The statute further provides that the Commission, upon application, may order a change of supplier "on the basis that it is in the public interest for a reason other than a rate differential."

7. Based on the application filed herein and Applicant's reasons set forth, it appears that the change of supplier request from Liberty to Ozark Electric is not based solely on a perceived rate differential.

8. Ozark Electric further states that it does have an overhead line running along the road frontage of Applicant's property and could provide service at that location.

9. Pursuant to Ozark Electric's current line extension policy, Applicant would be required to pay $1,000.00 for Ozark to extend service to this location if his application is approved.

10. Ozark Electric supports the anti-flip-flop laws and is hesitant to agree with a change of supplier. However, Ozark Electric will not oppose this request and states that it is willing to serve Applicant's property if Applicant's request is approved.

11. Ozark Electric further states that it would be agreeable to Applicant's request for change of supplier on the condition that any costs to serve Applicant shall be taxed to and borne solely by Applicant, including the aforementioned line extension fee.

WHEREFORE, Ozark Electric submits this Response to Application and requests such relief as is just and proper under the circumstances.

Respectfully submitted,

By: *<u>/s/ Shawn P. Battagler</u>*

CARNAHAN EVANS PC
2805 S. Ingram Mill Road
P.O. Box 10009
Springfield, MO 65808-0009
Phone: (417) 447-4400
Fax: (417) 447-4401
Email: sbattagler@carnahanevans.com
Attorneys for Respondent
Ozark Electric Cooperative

CERTIFICATE OF SERVICE

I hereby certify that the above document was filed in EFIS on this 8th day of May, 2026, with notification of the same being sent to all counsel of record.

By: *_/s/ Shawn P. Battagler___________*