

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

In the Matter of the Application of Central	)	
Missouri Electric Cooperative, Inc. for Approval	)	
Of Designated Service Boundaries Within	)	File No. EO-2026-0070
Portions of Pettis County, Missouri	)	

**CENTRAL MISSOURI ELECTRIC COOPERATIVE, INC.’S RESPONSE IN
OPPOSITION TO KEITH HASLAG’S APPLICATION TO INTERVENE**

COMES NOW, Central Missouri Electric Cooperative, Inc., ("CMEC"), for its response in opposition to Keith Haslag’s Application to Intervene in this case, and states as follows:

1. CMEC filed an application on September 19, 2025 pursuant to Section 386.800.3 RSMo and Commission Rule 4240-20.045, for an order approving designated service boundaries.
2. CMEC and Evergy Missouri West, Inc. d/b/a Every Missouri West (“Evergy”) filed a Stipulation and Agreement on June 25, 2026, containing a proposed Territorial Agreement, agreed to by the parties as a settlement of this case, to which the Office of the Public Counsel (“OPC”) objected.
3. CMEC, Evergy, the Commission’s Staff and OPC on August 6, 2026 addressed OPC’s objection to the proposed Stipulation and Agreement by the filing of a Joint Motion for New Order and Notice.
4. The Commission granted the Joint Motion for New Order and Notice and set an Intervention deadline of September 11, 2026.
5. On September 11, 2026, Keith Haslag (“Haslag”) filed his Application to Intervene in this case.

6. Mr. Haslag receives single-phase electric service from CMEC for his farming operation at 28017 Prairie Road, Sedalia, MO 65301.
7. Pursuant to 20 CSR 4240-2.075(3) the Commission may grant a motion to intervene or add new member(s) if –
 - (A) The proposed intervenor or new member(s) has an interest which is different from that of the general public and which may be adversely affected by a final order arising from the case; or
 - (B) Granting the proposed intervention would serve the public interest.
8. Mr. Haslag's farming operation (chicken barns) and energy usage under CMEC Rate 5 are not unique, and is not considered to be a large business or customer by CMEC. Mr. Haslag is one of 67 consumer/members of CMEC that, because of their level and nature of electric usage, fall within the parameters of being billed under CMEC Board of Director's approved Rate 5.
9. As a rural electric cooperative organized pursuant to Chapter 394 RSMo, the Commission has no jurisdiction over the service, rates, financing, accounting or management of CMEC. RSMo 394.160.
10. As required by Commission rule 20 CSR 4240-3.130, CMEC and Evergy included with their proposed Territorial Agreement a complete legal description of their respective exclusive areas under the proposed Territorial Agreement as Exhibits A & B to the agreement and several maps of the proposed exclusive territories of each as Exhibit C to the agreement. For convenience, page 1 of Exhibit C to the proposed

Territorial Agreement, the overview map of the entire proposed exclusive territories is attached hereto as Exhibit 1.

11. The parcel of property containing Mr. Haslag's farming operation at 28017 Prairie Road, Sedalia, MO 65301 is not physically within the proposed exclusive service territories of either CMEC or Evergy as depicted in Exhibit 1.
12. Indeed, Mr. Haslag owns no real property within the proposed exclusive service territories of either CMEC or Evergy and he is currently free to seek electric service for future additional buildings from either provider, and will continue to be free to seek electric service for future additional buildings from either provider regardless of the Commission's final order arising from this case. See attached Exhibit 2, a series of maps depicting the precise location of Mr. Haslag's real property as indicated within his Application to Intervene, versus the proposed exclusive service territories sought in this case by CMEC and Evergy.
13. Mr. Haslag's real property location is nowhere near the proposed exclusive service territories of either CMEC or Evergy as depicted in Exhibits 1 and 2 and should not be considered "on the boundary" of the proposed exclusive service territories.
14. CMEC is unsure of what Mr. Haslag is alleging in paragraph 7 of his Application to Intervene, in regard to the statement that "Applicant is aware that territorial agreements in past Commission proceedings have evolved or been changed during the Commission's review process". CMEC is unaware of any such occurrence and does not believe that such an allegation meets the standard for intervention under 20 CSR 4240-2.075(3).

15. Likewise, CMEC is unsure of what Applicant is alleging in paragraph 8 of his Application to Intervene, in regard to the statement that Mr. Haslag is “located on the evolving boundary line of the exclusive service areas”. CMEC is unaware of any such occurrence and does not believe that such an allegation meets the standard for intervention under 20 CSR 4240-2.075(3).
16. The terms of the proposed Territorial Agreement at Section 13.E., are such that if the Commission does not approve the provisions of the agreement, as filed by CMEC and Evergy, then it shall be nullified and of no legal effect between the Parties. Furthermore, Section 13.C. states that the terms of the proposed Territorial Agreement and the boundaries described in the agreement may only be modified in a writing signed by both CMEC and Evergy and approved by the Commission.
17. Pursuant to 20 CSR 4240-2.075(3) Mr. Haslag’s Application to Intervene fails to meet the standards for intervention in this matter. Mr. Haslag’s single-phase service under CMEC rate 5 is not unique and his real property is located neither within nor on the boundary of the proposed exclusive service territories. Consequently, he will not be adversely affected by a final order arising from this case.
18. Granting Mr. Haslag intervention in this case is not necessary for the Commission’s resolution of the case as Mr. Haslag cannot be affected in any way by the proposed Territorial Agreement. Any evidence or arguments offered by Mr. Haslag would be wholly irrelevant and would only further delay resolution of this case (filed one year ago) and potentially subject the existing parties to unnecessary and costly discovery on matters that are in no way related to the proposed Territorial Agreement or the Commission’s resolution of the case.

WHEREFORE, Central Missouri Electric Cooperative, Inc. respectfully requests the Commission deny Keith Haslag's Application to Intervene in this case.

Respectfully submitted,

/s/Andrew Sporleder
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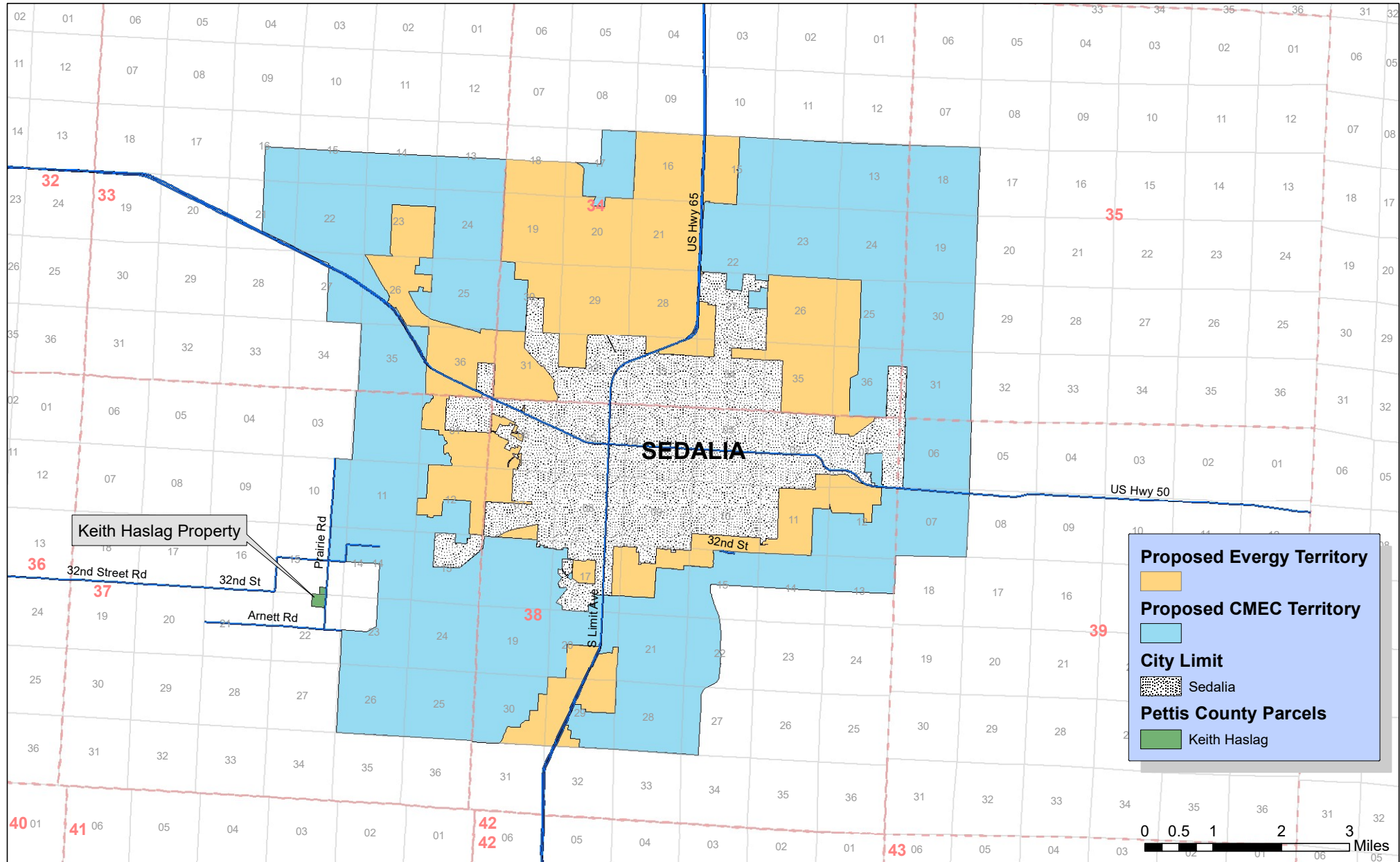
CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of September, 2026, I served a true and correct copy of the foregoing upon counsel for all parties by EFIS filing and notification, and/or email and also to counsel for Keith Haslag:

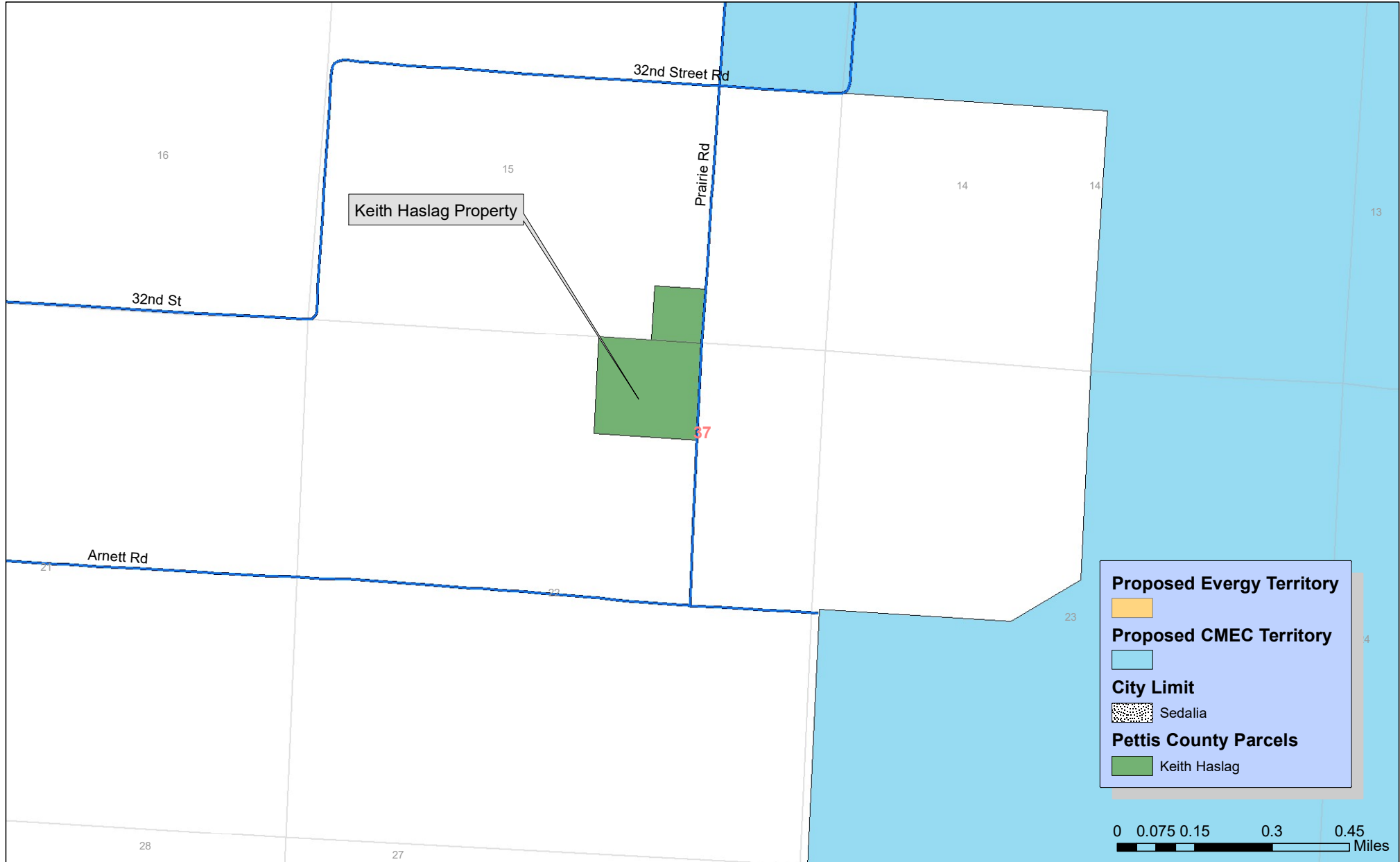
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/s/ Andrew Sporleder

Keith Haslag Location \ Proposed Exclusive Service Territories



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