

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

In the Matter of Nancy Price for a Change of)
Electric Provider) File No. EO-2015-0017

**RESPONSE TO APPLICATION FOR CHANGE
OF ELECTRIC SERVICE PROVIDER**

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) and in response to the Application for Change in Electric Service Provider (Application) filed by Nancy Price, states as follows:

1. On July 16, 2014, Ms. Price filed a request for a change of electrical supplier from Tri-County Electric Cooperative (Tri-County) to Ameren Missouri.
2. There is no basis in the law which would allow the Missouri Public Service Commission (Commission) to grant this Application. Missouri Revised Statute Section 394.315 provides cooperatives with the exclusive right to serve, once it “lawfully commences supplying retail electric energy to a structure through permanent service facilities...” (Section 394.315.2 RSMo.). The statute goes on to say the Commission may order a change on the basis that it is in the public interest “for a reason other than a rate differential...” (Id.).
3. Here, Tri-County has already lawfully commenced supplying retail electric energy to the applicant and so retains the exclusive right to serve applicant as applicant has not established a reason other than rate differential for her request.
4. Ameren Missouri requests the Application be denied.

WHEREFORE, for the reasons cited above, Ameren Missouri respectfully requests this Commission to enter an order denying Ms. Price’s Application for a Change in Electric Service Provider and for such other and further relief deemed proper under the circumstances.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ *Wendy K. Tatro*

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to all counsel of record on this 15th day of August, 2014.

/s/ *Wendy K. Tatro*