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

In the Matter of the Application of	)	
Pro Builders Since 1994, LLC	)	
for Change of Electric Supplier from	)	File No. EO-2019-0061
Kansas City Power and Light	)	
To Platte-Clay Electric Cooperative, Inc.	)	

## RESPONSE OF PLATTE-CLAY ELECTRIC COOPERATIVE, INC. TO APPLICATION OF PRO BUILDERS SINCE 1994, LLC

COMES NOW Platte-Clay Electric Cooperative, Inc., ("Platte-Clay") by and through its undersigned counsel, and for its response to the Application of Pro Builders Since 1994, LLC (hereinafter "Pro Builders") for Change of Electric Supplier, respectfully states as follows:

- Platte-Clay is without information to confirm or deny Pro Builders' allegations regarding an estimate from Kansas City Power and Light to construct three-phase power.
- 2. Platte-Clay affirms that it provided an initial rough estimate of \$5,000.00 to construct three-phase power to Pro Builders. Platte-Clay further states that, after meeting with Pro Builders on or about October 5, 2018 and being fully informed of the desired size of service requested, a revised estimate of \$9,055.00 was provided to Pro Builders.
- Platte-Clay affirms that it anticipates construction of such three-phase to take approximately four weeks. Platte-Clay is without information to confirm or deny Pro Builders' allegations regarding estimated construction time of Kansas City Power and Light.

- Platte-Clay takes no position on the sufficiency of Pro Builders' complaint for satisfaction of the statutory standard for approval of a change of electric supplier.
- Platte-Clay affirms that it has existing three-phase power across Pro Builders' property and along 45 Highway and that such three-phase is capable of serving Pro Builders.
- 6. Platte-Clay affirms that if Pro Builders' application is approved, Platte-Clay has sufficient ability to become Pro Builders' electric supplier.
- 7. Platte-Clay is without information to confirm or deny all remaining allegations contained in Pro Builders' Application.

Respectfully submitted,

ANDERECK, EVANS, LEWIS, FIGG, & BATTAGLER, L.L.C.

By: /s/ Megan E. Ray

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ATTORNEYS FOR PLATTE-CLAY ELECTRIC COOPERATIVE, INC.

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a complete copy of the foregoing instrument was served upon:

Missouri Public Service Commission Staff Counsel Department 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, MO 65102 staffcounselservice@psc.mo.gov

Office of the Public Counsel Hampton Williams 200 Madison Street, Suite 650 P.O. Box 2230 Jefferson City, MO 65102 opcservice@ded.mo.gov

Shane E. Bartee 421 Main Street Weston, MO 64098 sebartee@outlook.com Attorney for Pro Builders

By e-mail and/or enclosing same in envelopes addressed to the attorneys of record of said parties at their business addresses as disclosed in the pleadings of record therein, with first class postage fully prepaid, and by depositing said envelope in a U.S. Post Office mail box in Springfield, Missouri, on October 9, 2018.

/s/ Megan E. Ray