

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

In the Matter of the Application of)
Shannon Barth for Change of Electric) Case No. EO-2023-0039
Supplier from City of Butler to Osage)
Valley Electric Cooperative)

In the Matter of the Application of Janet)
Castrogiovanni for Change of Electric) Case No. EO-2023-0040
Supplier from City of Butler to Osage)
Valley Electric Cooperative)

In the Matter of the Application of Kathy)
Castrogiovanni for Change of Electric) Case No. EO-2023-0041
Supplier from City of Butler to Osage)
Valley Electric Cooperative)

In the Matter of the Application of David)
Crist for Change of Electric Supplier from) Case No. EO-2023-0042
City of Butler to Osage Valley Electric)
Cooperative)

In the Matter of the Application of Roger)
Farrell for Change of Electric Supplier) Case No. EO-2023-0043
from City of Butler to Osage Valley)
Electric Cooperative)

In the Matter of the Application of James)
and Cathy Loomis for Change of Electric) Case No. EO-2023-0044
Supplier from City of Butler to Osage)
Valley Electric Cooperative)

In the Matter of the Application of Brent)
and Melody Mullins for Change of Electric) Case No. EO-2023-0045
Supplier from City of Butler to Osage)
Valley Electric Cooperative)

In the Matter of the Application of Brian)
and Anna Shrock for Change of Electric) Case No. EO-2023-0046
Supplier from City of Butler to Osage)
Valley Electric Cooperative)

In the Matter of the Application of Michael)
and Elizabeth Taranto for Change of) Case No. EO-2023-0047

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| Electric Supplier from City of Butler to Osage Valley Electric Cooperative |)) | |
| In the Matter of the Application of Todd and Antionette Allen for Change of Electric Supplier from City of Butler to Osage Valley Electric Cooperative |)))) | <u>Case No. EO-2023-0048</u> |
| In the Matter of the Application of Wayne and Jenny Vermillion for Change of Electric Supplier from City of Butler to Osage Valley Electric Cooperative |)))) | <u>Case No. EO-2023-0049</u> |
| In the Matter of the Application of Scott Nameth for Change of Electric Supplier from City of Butler to Osage Valley Electric Cooperative |)))) | <u>Case No. EO-2023-0050</u> |
| In the Matter of the Application of Chance and Shanya Hedrick for Change of Electric Supplier from City of Butler to Osage Valley Electric Cooperative |)))) | <u>Case No. EO-2023-0051</u> |
| In the Matter of the Application of Shane and Nicole McCoun for Change of Electric Supplier from City of Butler to Osage Valley Electric Cooperative |)))) | <u>Case No. EO-2023-0063</u> |
| In the Matter of the Application of Matt and Karen Cochran for Change of Electric Supplier from City of Butler to Osage Valley Electric Cooperative |)))) | <u>Case No. EO-2023-0064</u> |

**THE OFFICE OF PUBLIC COUNSEL’S
RESPONSE IN OPPOSITION TO STAFF’S MOTION TO STAY**

COMES NOW the Office of Public Counsel and, without taking a position on the merits in any of the above cases or in Case No. EO-2023-0126, opposes Staff’s motion to “stay further proceedings in these dockets until the conclusion of the Territorial Agreement” on the ground that, regardless of the merits of their requests, each of the applicants in these cases¹ has requested for

¹ While Staff did not include Case No. EO-2023-0050 in its motion, since the applicant in that case is similarly situated, Public Counsel has included that case in its response to Staff’s motion.

relief that, prospectively their electric service provider at the addresses they identify be Osage Valley Electric Cooperative. Assuming undersigned counsel correctly understands the territorial agreement between the City of Butler to Osage Valley Electric Cooperative to which Staff presumably is referring in its motion—the agreement filed in Case No. EO-2023-0126—then the City of Butler would continue to be the electric service provider to those structures. In short, the relief the applicants in these change of supplier cases have requested is inconsistent with that they would get through the territorial agreement.

Respectfully,

/s/ Nathan Williams

Nathan Williams
Chief Deputy Public Counsel
Missouri Bar No. 35512

Office of the Public Counsel
Post Office Box 2230
Jefferson City, MO 65102
(573) 526-4975 (Voice)
(573) 751-5562 (FAX)
Nathan.Williams@opc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 25th day of October 2022.

/s/ Nathan Williams