

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

The Staff of the Missouri Public Service Commission,	)	
	)	
	)	
Complainant	)	
	)	
v.	)	<u>Case No. WC-2022-0289</u>
	)	SC-2022-0290
	)	
Northgate MHP Lindale, LLC,	)	
d/b/a Northgate MHC	)	
	)	
Respondent.	)	

**RESPONDENT’S ANSWER**

COMES NOW Northgate MHP Lindale, LLC d/b/a Northgate MHC, by its attorney, and for its Answer to the Staff’s Complaint states as follows:

1. Respondent admits that potable water supplied by a Public Water District was delivered to residents of Northgate Manufactured Home Community, and wastewater from residents of Northgate Manufactured Home Community is discharged into sanitary sewer lines that are connected to the public sewer lines of a public sewer company, but denies all other averments of fact in Paragraph 1 of the Complaint.
2. Respondent admits the identification of the Complainant, but denies any further averments of kind in Paragraph 2 of the Complaint.
3. Respondent admits the averments contained in Paragraph 3 of the Complaint.
4. Paragraph 4 of the Complaint makes no averment of fact and, accordingly, requires no response.
5. Paragraph 5 of the Complaint makes no averment of fact and, accordingly, requires no response.
6. Respondent denies the averments contained in Paragraph 6 of the Complaint.
7. Respondent denies the averments contained in Paragraph 7 of the Complaint.
8. Respondent denies the averments contained in Paragraph 8 of the Complaint.
9. Respondent denies the averments contained in Paragraph 9 of the Complaint.

10. Respondent denies the averments contained in Paragraph 10 of the Complaint.
11. Paragraph 11 of the Complaint makes no averment of fact and, accordingly, requires no response.
12. Paragraph 12, and each subparagraph therein, of the Complaint makes no averment of fact and, accordingly, requires no response.
13. Paragraph 13 of the Complaint makes no averment of fact and, accordingly, requires no response.
14. Respondent admits the averments contained in Paragraph 14 of the Complaint.
15. Respondent admits the averments contained in Paragraph 15 of the Complaint.
16. Respondent admits that a letter dated March 7, 2022 was delivered to residents of the mobile home park, but denies other and further averments and conclusions as may be stated in Paragraph 16 of the Complaint.
17. Respondent admits that it has delivered monthly statements to tenants for rent and additional rent, but is without adequate information to admit or deny any of the remaining averments contained in Paragraph 17 of the Complaint and therefore deny the same, including the authenticity of Attachment A.
18. Respondent denies the averments contained in Paragraph 18 of the Complaint.
19. Respondent denies that it is operating water and sewer utilities subject to supervision or jurisdiction of the Public Service Commission and further denies all other remaining averments contained in Paragraph 19 of the Complaint.
20. Respondent denies the averments contained in Paragraph 20 of the Complaint.

WHEREFORE, having fully answered, Respondent requests that the Commission dismiss the Complaint.

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/s/ FLOYD T. NORRICK #30447  
Attorney for Respondent

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by electronic mail on this 3<sup>rd</sup> day of June, 2022 to: ([Carolyn.Kerr@psc.mo.gov](mailto:Carolyn.Kerr@psc.mo.gov)) Carolyn H. Kerr, Senior Staff Counsel, Missouri Public Service Commission.

/s/ Floyd T. Norrick #30447