

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

The Staff of the Missouri Public Service Commission,)	
)	
)	
Complainant,)	
)	
v.)	
)	
Aspen Woods Apartment Associates, LLC, Barry Howard, Aspen Woods Apartments, Sapal Associates, Sachs Investing Co., Michael Palin, Jerome Sachs, and National Water & Power, Inc.)	
)	
Respondents.)	

Case No. WC-2010-0227

**RESPONSE TO ORDER GIVING NOTICE OF DEFICIENCY
AND DIRECTING NATIONAL WATER AND POWER SERVICES CORPORATION
TO SHOW CAUSE**

COMES NOW Craig S. Johnson, Berry Wilson, LLC, who is simultaneously with this Response re-entering his appearance as attorney of record for Respondent National Water & Power, Inc. (NWP). On June 14, 2010 the undersigned and NWP received the Commission's Order Granting Motion for Withdrawal purportedly issued and effective June 16, 2010. The undersigned is, simultaneously with this filing, re-entering his appearance as attorney for NWP.

NWP submits the following Response to the Commission's June 7, 2010 Order Giving Notice of Deficiency and Directing National Water and Power Services Corporation (NWP) to Show Cause:

1. Michael Foote has informed the undersigned that he will not seek *pro hac vice* admission to become an attorney of record in this docket, and that NWP will rely upon the appearance and services of the undersigned as the attorney of record for NWP. NWP and Mr. Foote hereby respectfully request that this announcement that Mr. Foote and NWP will not be

seeking Mr. Foote's representation *pro hac vice* be deemed sufficient good cause to satisfy the deficiency of the March 3, 2010 attempted Answer identified in the June 7 Order of the Commission.

2. The March 16, 2010 Answer filed on behalf of NWP bore the signature of the undersigned, who is licensed to practice law in the state of Missouri, was so licensed at the time of filing, and who has practiced before this Commission. NWP does not believe that it is necessary that Mr. Foote enter an appearance *pro hac vice* on behalf of NWP, as NWP now has on file an Answer filed herein by a licensed member of the Missouri Bar. NWP intends to stand by this Answer as properly filed on its behalf, unless the Commission has some other direction in this regard. If the Commission so directs, NWP will re-file its March 16 Answer deleting the reference to Mr. Foote's inclusion thereon listing him as co-counsel of record for NWP in this proceeding. NWP respectfully requests that this response to the Commission's June 7 Order be deemed good cause satisfying that Order.

3. In summary, NWP respectfully requests that, in consideration of the foregoing, this pleading be accepted as a satisfactory showing of good cause, and a satisfactory curing of the deficiency of Mr. Foote's attempted March 3, 2010 Answer.

WHEREFORE, NWP respectfully requests that this filing be accepted as an adequate showing of good cause and curing of deficiency.

/s/Craig S. Johnson
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading was electronically mailed to the following attorneys of record in this proceeding this 16th day of June, 2010:

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/s/ Craig S. Johnson