

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

The Staff of the Missouri Public Service Commission,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. WC-2022-0295
	)	SC-2022-0296
	)	
I-70 Mobile City, Inc.	)	
d/b/a I-70 Mobile City Park	)	
	)	
Respondent.	)	

**AFFIDAVIT**

COUNTY OF HUNT        )  
                                  ) ss.  
STATE OF TEXAS        )

Jennifer Hunt, of lawful age, being duly sworn, deposes and states:

1. My name is Jennifer Hunt. I have personal knowledge of the matters set forth herein.
2. I am the President of I-70 Mobile City. In this role, I have had general supervisory responsibility for operations at I-70 since April 2016.
3. I am familiar with the facts underlying this affidavit, and the same are true to the best of my knowledge, information, and belief.

**About I-70 Mobile City**

4. I-70 Mobile City, Inc. is a Missouri corporation with its principal place of business at 1449 Outer Road, Bates City, Missouri, 64011.
5. I-70 Mobile City has been operating a mobile home, RV, and rental lot community for almost 40 years (since 1985) in the same location.
6. I-70 Mobile City has never been contacted by the Commission until

April 2021.

7. I-70 Mobile City has never been the subject of a Commission complaint or investigation until this matter.

8. I-70 Mobile City has never been the subject of any complaints made to any other federal agencies (e.g., HUD) or any other state agencies (e.g., the Attorney General's Office).

9. On the property owned by I-70 Mobile City, there are rental areas for parking spaces for removable items with wheels, like cars, motorcycles, utility trailers, RVs, mobile homes, tiny homes, boats, etc. There are approximately 141 rental areas in I-70 Mobile City. As of July 2022, 45 of the rental areas were occupied by mobile homes, 23 were occupied by recreational vehicles, and 1 was occupied by a tiny home. Approximately 64 tenants were receiving water or sewer service.

### **I-70 Experience with the Commission**

10. In April 2021, a disgruntled tenant at I-70 called the Commission to make a complaint about the cost of her utility bill; the Commission staff investigated and determined the claims made by the tenant were false; the Staff nevertheless decided to "investigate" I-70.

11. I-70 voluntarily answered a "questionnaire" from the Commission Staff and met with Staff to answer any questions.

12. Staff then filed a complaint; pursuant to Commission rule, I-70 requested mediation, which the Commission Staff refused.

13. Upon learning that mediation was off the table, and the Commission had ordered I-70 to file a response to the complaint, Commission Staff emailed each other "Let's get this party started."

14. I-70 maintains government entry upon private property is not a laughing matter or cause for celebration.

15. I-70 has admitted (through the PSC discovery process) how many and what facilities and assets are on its property.

16. Staff's Complaint makes not a single allegation about the condition or quality of equipment used or about the safety or quality of the water and/or sewer service at I-70.

17. Prior to Staff filing the Complaint, I-70 voluntarily provided to the Commission:

- Copies of water bills and payments, and payment ledger to Bates City;
- Water for the park's service for June 2020 to June 2021;
- Sample forms of communications to tenants for their utility service;
- Excel Billing Histories for June 2020 to September 2020;
- Ledgers of tenant payments from June 2020 to September 2020;
- Software ledger from billing program for October 2020 to June 2021; and
- A summary of I-70 Mobile City billing and payment of water vs. tenant utility services from May 5, 2020 to June 5, 2021.

18. Since the filing of the Complaint, I-70 has responded to 37 separate data requests issued by the Commission Staff. Since the Petition in this case, the Commission Staff has issued nine more data requests to I-70.

19. At no time has the Commission Staff requested photos from I-70 of any facility, lagoon, connection, water meter, appurtenance or any other photos of the property.

### **I-70 Mobile City Operations**

20. At I-70 Mobile City, water is supplied through Bates City.

21. The sewer or wastewater services for I-70 Mobile City is provided through a lagoon which is permitted and regulated by the Missouri Department of Natural Resources.

22. In its leases with its tenants at I-70 Mobile City, I-70 makes contractual arrangements for tenants to reimburse I-70 for the tenants' share of I-

70's water and wastewater service bills.

23. I-70 allocates the costs for water and sewer service to individual tenants.

24. Individually allocated amounts for water and sewer service are collected by I-70 Mobile City.

25. I-70 only leases individual lots at I-70 Mobile City to persons who sign a lease agreeing to the arrangements as described herein for water and sewer service and billing.

26. I-70 Mobile City does not provide water or sewer services to the public.

27. I-70 Mobile City does not provide water or sewer services to all individuals who rent spaces or land at I-70 Mobile City.

28. I-70 only obtains reimbursement for the provision of water and sewer service from tenants at I-70 Mobile City.

29. I-70 Mobile City is a private property belonging to I-70 Mobile City, subject to the leasehold interests of tenants.

30. With respect to leasing individual lots at I-70 Mobile City, I-70 does not offer the lots to the general public indiscriminately. I-70 only leases individual rental lots to persons meeting the eligibility criteria of I-70 Mobile City. The eligibility criteria includes management approval, length of stay, vehicle storage tank capabilities, and available rental space, and entering into a lease contract in a form approved by or acceptable to I-70 Mobile City where the tenant agrees to the terms and condition of leasing a lot from I-70 Mobile City.

31. I-70 offers private water and sewer connections to certain tenants, who meet specific criteria, who then also execute a contract with I-70 Mobile City. Under some contracts, I-70 will offer rental space but may not offer water/sewer service at any time during the rental period. Some tenants will be billed for rental

space but not for water/sewer service. Some examples of criteria include that new and established individuals must pass our thorough land rental application process, which includes various informational questions, credit and criminal background searches. Any home must meet I-70's criteria and standards for proper appearance, repair, and maintenance during the application process and duration of the entire rental period.

**Mobile Home and RV Communities in Missouri, Generally**

32. According to the Missouri Manufactured Housing Association (www.mmha.net), there are more than sixty "communities" of manufactured homes in Missouri;

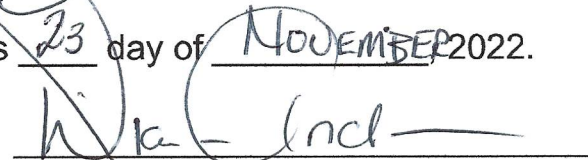
33. According to Mobile Home Village Park Store, there are more than 900 mobile home communities and 450 RV communities in Missouri; and

34. On information and belief, the Commission only regulates one mobile home community in Missouri, a community that voluntarily applied for and obtained certificates of convenience and necessity in Missouri PSC Case Nos. SM-2018-0017 and WM-2018-0018.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Jennifer Hunt

Subscribed and sworn before me this 23 day of NOVEMBER 2022.

  
\_\_\_\_\_  
NOTARY PUBLIC

My commission expires:

