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

ANCHOR'S POINT CONDOMINIUM OWNERS ASSOCIATION, INC.,	)
Complainant,	)
v.	) File No. WC-2020-0048
TRR MANAGEMENT, LLC; FRANK J. STEED, JR., d/b/a STEED COMMUNITIES; JM LAND HOLDINGS, LLC; TRR TIME SHARE, LLC; CARROLL JAMES CHRISTIANSEN; KIMBERLING INN, INC.; and KIMBERLING PROPERTIES, INC.	) ) ) ) ) ) ) ) )
Respondents.	)

## **STATUS REPORT**

COMES NOW Complainant Anchor's Point Condominium Owners Association, Inc. ("Complainant" or "APCOA"), by counsel, and states the following for its Status Report:

- 1. On November 9, 2020, Complainant and Respondents filed a Joint Motion to Stay Proceedings and Suspend Procedural Schedule (the "Joint Motion") in this action.
- 2. On November 24, the Commission entered an Order Further Staying Proceedings and Ordering Status Report (the "Order"), in which the Commission (a) granted the Joint Motion; (b) canceled the evidentiary hearing set for April 27, 2021; and (c) directed the parties to file a status report no later than March 31, 2021.

3. In response to the Order's requirement that the parties file a status report, APCOA states the following:

The members of Complainant's board of directors continue to work with local contractors and with the Missouri Department of Natural Resources ("DNR"), with the goal of completing and operating a new well to serve APCOA members as soon as possible. The project has not yet been completed and has not been approved by DNR. However, the contractors are on site and continue to work toward completion of the well, the well-house and the distribution system; and the APCOA board members are in regular communication with DNR personnel and have taken all actions required to seek and ultimately obtain approval of the system once it is completed. When the project is completed, Complainant's counsel will immediately notify Respondent's counsel and the Commission if DNR approves the system and it becomes independently operational.

WHEREFORE, given that APCOA owner-members are still dependent upon Respondents' water system, APCOA requests that the Commission's stay of proceedings and suspension of the procedural schedule remain in effect until such time that APCOA's system has been completed, is approved by DNR, and is independently operational.

## HUSCH BLACKWELL LLP

/s/ J. Michael Bridges

J. Michael Bridges, MBN 41549 901 St. Louis Street, Suite 1800 Springfield, MO 65806 (417) 268-4000 (417) 268-4040 FAX michael.bridges@huschblackwell.com

## **CERTIFICATE OF SERVICE**

This is to certify that on March 22, 2021, a true and correct copy of the above and foregoing was filed and served electronically by the Public Service Commission to all parties receiving electronic notice; and a copy was mailed by regular mail, postage prepaid, to:

Carroll James Christiansen 299 County Road 4651 Berryville, AR 72616

Kimberling Properties, Inc. 11863 State Highway 13 P.O. Box 159 Kimberling City, MO 65686 Kimberling Inn, Inc. 11863 State Highway 13 P.O. Box 159 Kimberling City, MO 65686

Lee J. Viorel, Esq. 901 St. Louis Street, 20<sup>th</sup> Floor Springfield, MO 65806 **Attorney for the Steed Respondents** 

/s/ J. Michael Bridges