

[illegible]

COMES NOW Respondent, Cedar Green Land Acquisition, LLC and for its answer to
the above-styled complaint states as follows:

1. Respondent has insufficient information to either admit or deny and therefore denies same, as it is not competent to reach a legal conclusion; however, Respondent admits to providing water and sewer services.
2. Respondent admits that the statutes and the CSRs state what they state and denies all other allegations not admitted.

3. This Respondent admits that Gary F. Myers is a natural person who is a member of the Respondent limited liability company, and denies all other allegations not specifically admitted.

4. Respondent admits the allegations contained in this paragraph.
5. Respondent admits.
6. This paragraph does not require an answer, however Respondent understands that Complainant will make the reference set forth in this paragraph to refer to the Respondents.

COUNT I

7. Respondent incorporates its previous answers as its answer to this paragraph.
8. Respondent has insufficient information to either admit or deny and therefore denies same; further this paragraph contains legal conclusions rather than facts.
9. Respondent has insufficient information to either admit or deny and therefore denies same; this paragraph contains a legal conclusion rather than facts; and any facts set forth are set forth in the disjunctive.
10. This is a legal conclusion, and Respondent admits that the Revised Statutes of Missouri state what they state, and denies all other allegations contained in this paragraph.
11. Respondent admits in part and states that it does not have an Exhibit "B".
12. Respondent admits.
13. Respondent has insufficient information to either admit or deny as to what is appropriate, however Respondent admits it has not received any approvals or consent from the Commission or provided any approvals from any municipality and Respondent has not made the referenced filing with the Commission, and denies all other allegations not specifically herein admitted.
14. Respondent admits.

15. Respondent has insufficient information to either admit or deny and therefore denies same.

WHEREFORE, Respondent prays that the Commission will make the appropriate findings based upon the facts presented, and make the appropriate findings as to what documents and approvals Respondent must submit and receive; permit Respondent a brief but reasonable amount of time to comply with all such requirements, if any, and grant any other and further relief deemed necessary and appropriate.

COUNT II

16. Respondent adopts his answers to the previous paragraphs and incorporates them as its answer to the allegations in this paragraph.

17. Respondent does not see an attachment B or C, however, Respondent admits that Gary F. Myers is a member of the Respondent limited liability company and denies all other allegations not specifically admitted.

18. Respondent admits that Gary Myers is a member of the Respondent limited liability company, and denies all other allegations not specifically admitted.

19. Respondent admits that Gary Myers is a member of the Respondent limited liability company and denies all other allegations not specifically admitted.

20. Respondent admits that Cedar Greens Land Acquisition, LLC, has not obtained approval from the Commission, has not filed a certified copy of the charter of a corporation with the Commission, or filed a verified statement showing it has received approvals from any municipality, and denies all other allegations not specifically admitted.

21. This paragraph does not contain a factual allegation and requires no response, however, Respondent is not competent to make this legal conclusion and has insufficient information to either admit or deny and therefore denies same.

WHEREFORE, Respondent prays that the Commission will make the appropriate findings, order Respondent to file with the Commission all documents necessary to file, and take all actions necessary to take; and grant any other and further relief deemed necessary and appropriate.

COUNT III

22. Respondent adopts his answers to the previous paragraphs and incorporates them as its answer to the allegations in this paragraph.

23. This paragraph requires no response, however, Respondent admits the Revised Statutes of Missouri state what they state.

24. This paragraph requires no response, however, Respondent admits the Revised Statutes of Missouri state what they state.

25. Respondent has insufficient information to either admit or deny and therefore denies same.

26. Respondent has insufficient information to either admit or deny and therefore denies same.

27. Respondent has insufficient information to either admit or deny and therefore denies same.

28. Respondent did not know that a situation existed and has insufficient information to either admit or deny and therefore denies same.

29. Respondent denies.

30. Respondent denies.

31. This paragraph requires no response, however, Respondent admits the Revised Statutes of Missouri provide what they provide and leaves interpretation of statutes to the Commission and the courts; Respondent denies all other allegations not specifically admitted.

WHEREFORE, Respondent prays the Commission will give all appropriate notices, make all appropriate findings, take into consideration all facts and weigh equities and make the appropriate findings, and grant such other and further relief as deemed appropriate by the Commission.

AFFIRMATIVE DEFENSES

1. Respondents state that they received legal advice and were never told that they had to file anything with the Public Service Commission or receive any approvals from the Public Service Commission and Respondent were unaware of any such requirements.
2. Respondents state that they were unaware of any situation regarding any overdue bill to the Laclede Electric and that the electricity was never disconnected and there was no interruption in service.
3. To the extent any resident paid an electric bill, said resident has been fully reimbursed.
4. Laclede Electric never intended to disconnect service to the facilities.
5. Respondents are willing to fully comply with all statutes, rules and regulations, and have always been willing to do so.
6. Respondents wish to fully cooperate with the Public Service Commission regarding all the allegations and shortcomings that the PSC finds to exist.

7. Respondents sought the approvals of the municipal governments and other governmental entities which they were aware that they needed approvals from, and received those approvals.
8. Respondents took all steps they were aware that they were required to take, and put in place all required procedures of which they were aware.
9. Respondents have now filed some required paperwork and are submitting additional paperwork, and applications.

Respectfully submitted,

s/Robert R. Paulson II/s

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served upon Meghan E. McClowry, attorney for Complainant on this 25th day of October, 2012.

s/Robert R. Paulson II/s

Robert R. Paulson II