

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

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| The Staff of the Missouri Public Service Commission, |) | |
| |) | |
| Complainant, |) | |
| |) | Case No. WC-2008-0079 |
| v. |) | |
| |) | |
| Universal Utilities, Inc., and Nancy Carol Croasdell, |) | |
| |) | |
| Respondents. |) | |

**STAFF’S MOTION FOR A COMMISSION ORDER COMPELLING
PRODUCTION OF BOOKS, ACCOUNTS, PAPERS OR RECORDS OF
UNIVERSAL UTILITIES, INC. AND NANCY CAROL CROASDELL**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), and pursuant to Section 386.450 RSMo, requests that the Missouri Public Service Commission (Commission) order Universal Utilities, Inc. and Nancy Carol Croasdell (Respondents) to produce any books, accounts, papers or records regarding its operations in the State of Missouri at the General Counsel’s offices at Room 810, 200 Madison Street, Jefferson City, MO 65102, on the 7th day of January, 2007 at 10 a.m., for the purpose of the examination of said books, accounts, papers or records, in accordance with Section 386.450 RSMo.

The Commission’s Order of December 13, 2007 found Respondents to be public utilities operating in Missouri and subject to the jurisdiction of the Commission. Respondents have failed and refused to comply with the Commission’s Order of November 1, 2007 ordering production of responses to data requests issued by Staff. Respondents have also failed and refused to comply with the Judgment of Contempt issued by Judge Oxenhandler on December 15, 2007 ordering Respondents to respond to

Staff's data requests no later than 5:00 p.m. on December 24, 2007. Pursuant to Section 386.450, RSMo, the Commission "may require, by order served upon any corporation, person or public utility. . ., the production within this state at such time and place as it may designate of any books, accounts, papers or records kept by said corporation, person or public utility in any office or place within or without this state, or at its option, verified copies in lieu thereof, so that examination thereof may be made. . .by the Commission or under its direction." Because Respondents have thus far failed and refused to comply with both the order of the Commission and Judge Oxenhandler's Judgment of Contempt, Staff submits that a Commission order directing the production of books, accounts, papers and records is appropriate.

WHEREFORE, Staff requests that the Commission issue an Order requiring Respondents to produce any and all books, accounts, papers, or records kept by either or both of them relating to business operations in Missouri. Staff further requests that the Commission name Room 810 of the Governor Office Building, 200 Madison Street, Jefferson City, Missouri, 65101 as the time and place of production.

Respectfully submitted,

/s/ Blane Baker

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 28th day of December 2007.

/s/ Blane Baker