

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

In the Matter of the Application Carl Richard)	
Mills d/b/a Carl R. Mills Water Service)	File No. WM-2020-0387
for a Transfer of Assets to the Carriage Oaks)	
Estates Homeowners Association)	

APPLICATION TO INTERVENE

COME NOW, Derald Morgan, Rick and Cindy Graver, William and Gloria Phipps, and David Lott (“Intervenors”), and pursuant to the Commission’s Order dated June 1, 2020, and 4 CSR 4240-2.075, seek to intervene in this matter. In support of their Application, Intervenors state as follow.

1. Intervenors Derald Morgan, Rick and Cindy Graver, William and Gloria Phipps, and David Lott are natural persons residing in the Carriage Oaks Subdivision in Stone County, Missouri.

2. Correspondence, communications, orders, and decisions may be sent to Intervenors’ attorney at the following address:

Hampton Williams
Schenewerk & Finkenbinder, Attorneys at Law, LLC
100 Prairie Dunes Dr., Ste. 200
Branson, MO 65616
Phone: 417-334-7922
Fax: 417-334-7923
e-mail: hampton@sfalwfirm.com

3. Intervenors seek to intervene in this case because they have an interest in the water services provided by the Carl Richard Mills in that they receive water services provided by the Carl Richard Mills.

4. Because Intervenors receive water services from the Carl Richard Mills, they have an interest in this matter that is different from those of the general public and could be adversely affected by the Commission's order in this case.

5. Intervenors seek to intervene in order to oppose the application.

6. Intervenors seek to provide information to the Commission regarding the alleged agreement of Carriage Oaks Estates Homeowners Association to receive the water utility, and furthermore inform the Commission that the proposed recipient homeowners' association would not be excused as per operations of terms of its *Declaration and Restrictive Covenants*, and thus would remain subject to the Commission's jurisdiction.

7. It will serve the public interest for the Public Service Commission to grant this application to intervene.

8. Intervenors oppose the approval of the Carl Richard Mills Trust application for a transfer of assets.

WHEREFORE, Intervenors Derald Morgan, Rick and Cindy Graver, William and Gloria Phipps, and David Lott request that the Public Service Commission grant their application to intervene.

Respectfully submitted,

SCHENEWERK & FINKENBINDER,
ATTORNEYS AT LAW, LLC

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COUNSEL FOR INTERVENORS

CERTIFICATE OF SERVICE

The below signed counsel hereby certifies that a true and accurate copy of the foregoing was sent to all counsel of record via email on June 12, 2020, to the following email addresses:

Mark Johnson [Mark.Johnson@psc.mo.gov];
Jamie Myers [Jamie.Myers@psc.mo.gov];
Missouri Public Service Commission [staffcounsel@psc.mo.gov];
Office of the Public Counsel [opc@opc.mo.gov];
Carl Richard Mills [mrrsykes@aol.com].

The above was also served via U.S. Mail, postage prepaid to the following interested parties on June 12, 2020:

Carriage Oaks Estates Homeowners Association
Legal Department
209 Falling Leaf Court
Reeds Spring, MO 65737

Missouri Department of Natural Resources
Legal Department
PO Box 176
Jefferson City, MO 65102-0176

/s/ Hampton Williams
Hampton Williams