

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

THE STAFF OF THE MISSOURI )  
PUBLIC SERVICE COMMISSION, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
OSAGE WATER COMPANY, )  
 )  
Defendant. )

Case No.: WC-2017-0009  
SC-2017-0010

**OSAGE WATER COMPANY'S RESPONSE TO  
STAFF'S MOTION FOR DEFAULT DETERMINATION**

Comes now Osage Water Company, by and through its Court-Appointed Receiver, and for its Response to Staff's Motion for Default Determination, states to the Commission as follows:

1. The undersigned, Court-Appointed Receiver, apologizes to the Commission for failing to timely file Annual Reports for 2013, 2014 and 2015.

2. Pursuant to the original directive given by the Court to the undersigned, the Receiver had two primary duties.

The first was to assume control of the plant and equipment of Osage Water Company and ensure that it functioned to provide safe and adequate water and wastewater services to its customers. That has and is continuing to be accomplished.

Second, the Receiver was to cause the Company's plant and equipment to be sold in a timely manner.

3. For the past several years, including 2013, 2014 and 2015, the Receiver has made significant effort in obtaining bids for Osage Water Company and attempted to sell the assets of Osage Water Company to a Commission approved company. To date, those sale efforts have

been unsuccessful, largely as a result of legal maneuvers taking place in the original Receivership, Case No. 26V010200965.

4. The Receiver thought the timing of the sale of the Company assets would be such that his duties as Receiver would be discharged and that it would not be necessary for him to file the 2013, 2014 or 2015 Annual Reports. However, the Receiver now recognizes that the event has not occurred.

Receiver states to the Commission that he will file the 2013, 2014 and 2015 Annual Reports no later than October 15, 2016.

WHEREFORE, Receiver prays that the Commission make and enter its Order granting the Receiver until October 15, 2016, to file the Company's Annual Reports for 2013, 2014 and 2015; and for such other and further relief as the Court deems just and proper under the premises.

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