

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

In the Matter of Missouri-American Water company §
For a Certificate of Convenience and Necessity §
Authorizing it to Install, Own, Acquire, Construct, § **File No. SA-2015-0065**
Operate, Control, Manage and Maintain a Sewer §
System in Benton County, Missouri §

**PROPOSED INTERVENOR’S/PETITIONER’S REPLY TO
MISSOURI DEPARTMENT OF NATURAL RESOURCES’ RESPONSE
IN OPPOSITION TO MOTION FOR OUT-OF-TIME INTERVENTION**

Comes Now, George M. Hall, Proposed Intervenor/Petitioner, and for his Reply to Missouri Department of Natural Resources’ Response In Opposition To Motion For Out-Of-Time Intervention, states as follows:

1. On November 17, 2014, the Commission Ordered that: **“Any party wishing to respond** to George M. Hall’s Motion For Out of Time Intervention and If necessary, Original Formal Complaint or, in the Alternative, Motion for Leave To Appear and File an Amicus Curiae Brief, **shall do so no later than [November 20, 2014, at 11:00 a.m.]**, emphasis added.

2. The Missouri Department of Natural Resources’ Response In Opposition was filed on 11-20-2014 at 1:44:13 p.m. as reflected in the Docket Sheet entry. As such, The Missouri Department Of Natural Resources has failed to comply with this Commission’s Order requiring a response be filed no later than 11:00 a.m. on 11-20-2014.

3. The Missouri Department of Natural Resources did not move for additional time in which to respond nor did the Department give any justifiable reason for not complying with the Commission’s Order.

4. Proposed Intervenor/Petitioner submits the failure on the part of the Missouri

Department To timely file its' Response In Opposition as Ordered and Directed results in nothing being presented for consideration on its behalf. Further, the Department of Natural Resources has not submitted any additional request for time to respond nor have they offered or submitted any excuse why they are exempt from the Commission's Order.

WHEREFORE, Proposed Intervenor/Petitioner, requests that the Response of the Missouri Department of Natural Resources be held untimely and not be given any consideration in this matter by the Commission.

Respectfully submitted,

/s/ George M. Hall

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CERTIFICATE OF SERVICE

I, George M. Hall hereby certify that a true and correct copy of the foregoing was mailed, faxed, or e-mailed to the following on this the 21st day of November, 2014:

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By: ---George M. Hall---
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