

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

In the Matter of the Application of Seges)
Partners Mobile Home Park, LLC for a Small)
Company Rate Increase Request.)

Case No. SR-2011-0133

REQUEST FOR WAIVER OF ANNUAL REPORT FILING

COMES NOW the Staff of the Missouri Public Service Commission (“Commission”),
by and through its attorney, and for its *Request for Waiver of Annual Report Filing*, states as
follows:

1. On August 12, 2009, the Commission issued a Certificate of Convenience and Necessity for Seges Partners Mobile Home Park, LLC (“Seges” or “Company”) to construct, install, own , operate, control, manage, and maintain water and sewer systems for the public in Callaway County, Missouri. The Commission also required the Company to complete water and sewer tariffs with certain charges before customers could be billed for service.

2. On December 1, 2009, the Company filed its tariff sheets, bearing an effective date of December 31, 2009. The Commission approved the tariff sheets on December 22, 2009.

3. Section 393.140 (6), RSMo 2000, requires that every corporation under the supervision of the Commission shall file an annual report.

4. 4 CSR 240-3.635, provides that the Company must submit an annual report by April 15 of each year. The Commission may waive any of its rules for good cause shown. 4 CSR 240-2.015.

5. On June 14, 2010, Allison Schowengerdt of Seges sent an email inquiry to Staff advising the recipient of the email that the Company’s rates did not go into effect until January 1, 2010 and inquiring whether the Company was required to file an Annual Report.

6. Due to a misunderstanding regarding the effective date of the tariffs, Staff incorrectly advised Ms. Schowengerdt that the Company would not have to file a 2009 Annual Report.

7. However, the Company should have filed a 2009 Annual Report because it was certificated by the Commission in August 2009 and the actual effective date of the tariffs was December 31, 2009.

8. Staff argues that good cause exists to waive the 2009 annual report filing requirement in this case because the failure to file the Company's 2009 Annual Report is not solely the fault of the Company and the tariffs were only in effect one day of 2009.

9. Additionally, on November 8, 2010, the Company filed for a small sewer company rate increase, so the Staff has the opportunity to review the company's financial records.

10. It is Staff's opinion that it would not be against public interest to allow the Company a variance from the Annual Report requirement.

WHEREFORE, the Staff respectfully submits this *Request for Waiver of Annual Report* for the Commission's information and consideration. Staff further states that it does not object to any Commission order granting Seges Partners Mobile Homes, LLC, reprieve from the requirement of filing a 2009 annual report, and further asks that the Commission direct Seges Mobile Homes, LLC, to attach the Commission's order in this case to its 2010 filing, due April 15, 2011.

Respectfully submitted,

/s/ Rachel M. Lewis

Rachel M. Lewis

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or e-mailed to all counsel of record on this 9th day of February, 2011.

/s/ Rachel M. Lewis