

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

The Staff of the Missouri Public Service Commission,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. WC-2022-0295
	)	SC-2022-0296
	)	
I-70 Mobile City, Inc.	)	
d/b/a I-70 Mobile City Park	)	
	)	
Respondent.	)	

**SUGGESTIONS IN OPPOSITION TO STAFF’S MOTION FOR AN ORDER DIRECTING GENERAL COUNSEL TO SEEK ENFORCEMENT OF THE COMMISSION’S ORDER**

I-70 Mobile City, Inc., by and through counsel, and for its Suggestions in Opposition to Staff’s Motion states as follows:

**Original Motion**

1. On July 8, 2022, Complainant Staff filed a Motion to Compel Discovery and requested the Commission “authorize the Public Service Commission’s General Counsel to seek a Circuit Court Order under § 536.073.2, RSMo (2016) to enforce Staff’s discovery request.”
2. Section 536.073.2, RSMo, provides that no Commission discovery order which permits entrance upon land or inspection of property is enforceable without an order of the circuit court, after notice and hearing.
3. On July 18, 2022, Respondent I-70 Mobile City filed Suggestions in Opposition to Staff’s Motion to Compel (attached hereto and incorporated by reference).

4. On September 6, 2022, Staff filed a “Motion for an Order Directing General Counsel to Seek Enforcement of the Commission’s Order” which essentially renews Staff’s request in its original motion.

5. For the same reasons in I-70’s initial response to Staff’s Motion to Compel, the Commission should deny the renewed Motion by Staff.

**WHEREFORE**, for the foregoing reasons, I-70 respectfully requests that the Commission deny the Staff’s Motion for an Order Directing General Counsel to Seek Enforcement of the Commission’s Order.

Respectfully submitted,

ELLINGER & ASSOCIATES, LLC

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission on September 13, 2022.

          /s/ Stephanie S. Bell            
Stephanie S. Bell