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

In the Matter of the Joint Application of	)		
188 North Summit, LLC and Seges Partners	)		
Mobile Home Park, LLC for	)		
Authority To Acquire The Water System	)	Case Nos.	SM-2018-0017
and Wastewater System Assets of	)		WM-2018-0018
Seges Partners Mobile Home Park LLC	)		
and For a Certificate of Convenience and	)		
Necessity to Provide Water and Sewer Services	)		

### APPLICANTS' RESPONSE TO ORDER DIRECTING FILING

- 1. On July 18, 2017, 188 North Summit, LLC and Seges Partners Mobile Home Park, LLC ("Applicants") filed a joint application with the Commission seeking authority for 188 North Summit, LLC to purchase substantially all of the water and sewer assets of Seges Partners Mobile Home Park, LLC. 188 North Summit, LLC also applied for a certificate of convenience and necessity to provide water and sewer services to customers presently served by Seges Partners.
- 2. On August 25, 2017, the Staff of the Commission filed a recommendation ("the Staff Recommendation") to approve the application subject to several conditions enumerated in the subparagraphs of paragraph 5 of the Staff Recommendation and on pages 4 and 5 of Appendix A thereof.
- 3. On August 28, 2017 the Commission directed the applicants to respond to the Staff Recommendation, specifically addressing the conditions set out therein and to do so no later than September 6, 2017.

4. Having reviewed each of the conditions and recommendations made by the Staff in the Staff Recommendation, and otherwise being fully advised, the applicants find each and every condition and recommendation acceptable and unobjectionable.

WHEREFORE, Applicants respectfully request the Commission to approve their application subject to the conditions set forth in the Staff Recommendation.

Respectfully submitted,

### /s/ Mark W. Comley

Mark W. Comley, Mo. Bar #28847 Newman, Comley & Ruth P.C. 601 Monroe Street, Suite 301 P.O. Box 537 Jefferson City, MO 65102-0537 (573) 634-2266 (voice) (573) 636-3306 (facsimile) comleym@ncrpc.com

Attorneys for 188 North Summit, LLC

#### /s/ William D. Steinmeier

William D. Steinmeier, Mo. Bar #25689 William D. Steinmeier, P.C. P.O. Box 104595 2031 Tower Drive Jefferson City, MO 65110-4595 Tel: 573-659-8672

Fax: 573-636-2305 wds@wdspc.com

Attorney for Seges Partners Mobile Home Park, LLC

# Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 29<sup>th</sup> day of August, 2017, to General Counsel's Office at staffcounselservice@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

/s/ Mark W. Comley