

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

DERALD MORGAN,)	
)	
Complainant,)	
)	
v.)	File No. WC-2021-0223
)	
CARL RICHARD MILLS)	
)	
Respondent,)	

COMPLAINANT’S RESPONSE TO STATUS REPORT

COMES NOW Complainant, J. Derald Morgan, by and through counsel, Karl Finkenbinder, and for his response to the Commission’s request for Status Report, states as follows:

1. This complaint was initiated by Complainant on January 13, 2021, along with a motion to consolidate the matter with WR-2021-0177.
2. The Commission denied Complainant’s motion on March 10, 2021, finding the complaint raised numerous and varied issues “involved in the rate case [which] would not be relevant to the complaint.”
3. As the Commission has already found that the rate case and the complaint raised different issues, and also that the terms of the Agreement filed by the signatories in WR-2021-0177 did not seek to resolve WC-2021-0223, the matters raised in WC-2021-0177 remain unresolved.
4. As of yet, Staff has not been directed to investigate the complaint.
5. As of today, Complainant has promulgated discovery, to which objections were filed.

6. Under the disposition agreement filed in WR-2021-0177, Mr. Mills is required to make several performative acts, which, to Complainant's knowledge, have not been verified, though filings indicate performance in part.

7. Complainant's request is that this matter be reset for a status in sixty (60) days to permit Complainant to conduct discovery, or otherwise the Commission direct the Staff to perform an investigation and file its findings within sixty (60) days.

Respectfully submitted,

SCHENEWERK & FINKENBINDER,
ATTORNEYS AT LAW, LLC

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COUNSEL FOR COMPLAINANT

CERTIFICATE OF SERVICE

The below signed counsel hereby certifies that a true and accurate copy of the foregoing was submitted through the Missouri Public Service Commission's E-Filing System, which generates notices to interested parties on July 26, 2021.

/s/ Karl Finkenbinder
Karl Finkenbinder