

In the Missouri Public Service Commission

In the matter of

Janice Shands

Complainant)

V WC 2015-0030

MAWC

Respondent

In the matter of

Janice Shands

Complainant)

V EC 2015-0043

Ameren

Respondent

In the matter of

Janice Shands

Complainant)

V SC 2015-0044

MSD

Respondent

In the matter of

Janice Shands

Complainant)

V GC 2015-0045

MSD

Respondent

Joinder of LCTCA and Complainants' Supplemental Opposition to Motion to Dismiss

Comes Janice Shands and LCTCA (as per the Entry) and joins in and/or supports the Shands complaint and the Shands prayer for relief that PSC find that conditions precedent have been met and that it is proper especially where there are common issues of law and fact with the circuit claims including against the shopping center and MSD that it is proper PSC defer to the courts and decline any jurisdiction especially where no administrative record or expertise is needed on the issues especially of the ultra vires actions under which LCTCA and its unit owners came to be viewed as responsible for the costs of utilities for the shopping center and /or portions of same.

Wherefore for these reasons well LCTCA and Janice Shands move for the above.

By

/s/ Susan H. Mello #31158

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Certificate of service

A copy was sent by email to P.C. Office of General Counsel at staff counsel@psc.mo.gov, to Dustin Allen (Public Counsel) at opscservice@ded.mo.gov, and counsel for the utilities on

September 19 2014

/s/ Susan H Mello

Entry of Appearance

Comes now Susan H Mello and

1 Where on September 18, 2104 , Judge Jamieson of the Circuit Court in St Louis in State ex rel Bennett v Lewis and Clark 195 LLC, 14 SL Cc 2207 ¹ court realigned the Lewis and Clark Tower Condo Assn (as now managed by the receiver) as a plaintiff, and appointed the undersigned to represent LCTCA

2 Without objection from the receiver or others, was granted leave to amend the circuit court action including to add MSD and Union Electric dba Ameren and LaClede Gas

3 Where the Shands PSC complaints were submitted solely to meet a MAWC, contention that needed to first file a PSC complaint

Enters her appearance for Lewis and Clark Tower Condominium Association for the purposes of meeting any claimed condition precedent to the claims in the above referenced lawsuit.

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¹On which official notice is requested via casenet.

September 19 2014

/s/ Susan H Mello