

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

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

STATUS REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and in response to the July 29, 2022 *Order Suspending Procedural Schedule and Directing Filing of a Monthly Status Report*, states as follows:

1. To date, the parties have been unable to schedule a site visit after the Commission granted Staff's June 3, 2022 *Request for Permission for Entry Upon Land for Inspection*, in that Respondent I-70 Mobile City, Inc. d/b/a I-70 Mobile City Park (I-70 MHP) insists that Staff obtain an Order pursuant to § 536.073.2, RSMo, from the Cole County Circuit Court seeking enforcement of the Commission's Order before it will allow and schedule the requested site visit.

2. Staff will be filing a motion with the Commission requesting authority for Commission General Counsel to pursue a motion in circuit court to enforce the Commission's June 3, 2022 Order allowing Staff access to Respondent's land for inspection.

3. Staff needs to be able to conduct a general inspection to ensure that I-70 MHP is operating lawfully and to determine the nature of its water and sewer services,

which would ultimately determine whether I-70 MHP should fall under the jurisdiction and regulation of the Commission.

4. On August 2, 2022, Staff submitted five Data Requests (DRs) to Respondent, four of which were follow-up requests from DRs previously sent in this case, and one was a new request. Respondent filed a letter listing nine general objections to all five DRs submitted by Staff on August 12, 2022.

5. Respondent timely answered four of the DRs on August 22, 2022. Respondent failed to answer DR 35.1 at that time. DR 35.1 involves whether customers' payments for sewer services are ultimately received by I-70 MHP or the local municipal system. Counsel for Staff sent an email to Respondent's counsel on August 24, 2022, stating that a response had not yet been received for DR 35.1 and asking if and when a response would be filed. A response to DR 35.1 was filed August 29, 2022.

WHEREFORE, the Staff respectfully offers and requests the Commission accept the foregoing Status Report in this case and grant any further relief as the Commission considers just and reasonable in the circumstances.

Respectfully submitted,

/s/ Carolyn H. Kerr
Missouri Bar Number 45718
Senior Staff Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
573-751-5397 (Voice)
573-526-6969 (Fax)
Carolyn.kerr@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 30th day of August, 2022, to all counsel of record.

/s/ Carolyn H. Kerr